

# **Exhibit J1**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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EASTERN PROFIT CORPORATION LIMITED,

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Plaintiff/Counterclaim Defendant,

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-against- Case No. 18-cv-2185 (JGK)

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STRATEGIC VISION US, LLC,

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Defendants/Counterclaim Plaintiff,

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-against-

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GUO WENGUI a/k/a MILES KWOK,

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Counterclaim Defendant.

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DEPOSITION OF

16

HAN CHUNGUANG

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New York, New York

18

November 11, 2019

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REPORTED BY: TERRI FUDENS

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FILE NO: AD0B4F6

Han Chunguang  
November 11, 2019

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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK</p> <p style="text-align: center;">-----X</p> <p>EASTERN PROFIT CORPORATION LIMITED, Plaintiff/Counterclaim Defendant, V. Case # 18-cv-2185 (JGK) STRATEGIC VISION US, LLC, Defendants/Counterclaim Plaintiff. V. GUO WENGUI a/k/a MILES KWOK, Counterclaim Defendant. -----X</p> <p style="text-align: center;">Deposition of HAN CHUNGUANG, a Non-Party Witness, taken by the Defendant-Counterclaim Plaintiff pursuant to Court Order held at 620 Eighth Avenue, New York, New York, commencing at 10:03 A.M., Monday, November 11, 2019, before Terri Fudens, a Stenotype Reporter and Notary Public of the State of New York.</p> <p style="text-align: right;">Page 2</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">I N D E X</p> <p>WITNESS: EXAMINATION BY: PAGES: Han Chunguang Ms. Donnelly 5</p> <p style="text-align: center;">E X H I B I T S</p> <p>DEFENDANT'S: DESCRIPTION: PAGES: 30 Notice of Change of Company Secretary and Director (Appointment/Cessation) Bates stamped EASTERN-000400 to 402 106 31 A piece of yellow paper containing the witness' name handwritten three times 109 32 A two-page document titled Limited Power of Attorney Bates stamped EASTERN-000276 and 277 109 33 A document titled Substitution of Counsel consisting of two pages 118 34 A document titled Research Agreement dated December 29, 2017 Bates stamped EASTERN-000005 to 000009 119 35 A document titled Loan Agreement Bates stamped EASTERN-000278 to 280 124 36 A black and white photograph of five people 153 * * * * *</p> <p style="text-align: right;">Page 4</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>A P P E A R A N C E S :</p> <p>PEPPER HAMILTON LLP Attorneys for Plaintiff/Counterclaim Defendant - Eastern Profit Corporation, Ltd. 1313 North Market Street Suite 5100 Wilmington, Delaware 19801</p> <p>BY: CHRIS CHUFF, ESQ.</p> <p>GRAVES GARRETT LLC Attorneys for Defendant/Counterclaim Plaintiff - Strategic Vision US LLC 1100 Main Street, Suite 2700 Kansas City, Missouri 64105 816.2563181</p> <p>BY: EDWARD D. GREIM, ESQ. edgreim@gravesgarrett.com</p> <p>JENNIFER DONNELLI, ESQ. jdonnelly@gravesgarrett.com</p> <p>GOLDEN SPRING (NEW YORK) LTD. In-House Counsel for Golden Spring 162 E. 64th Street New York, New York 10065 917.941.9698</p> <p>BY: DANIEL PODHASKIE, ESQ.</p> <p>ALSO PRESENT: French Wallop Michael Waller Yvette Wang Ann Chi Ho, Interpreter</p> <p style="text-align: right;">Page 3</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">HAN CHUNGUANG</p> <p>ANN CHI HO, the Interpreter, was duly sworn by Terri Fudens, a Notary Public of the State of New York, to accurately translate the following questions and answers to the best of her ability.</p> <p>H A N C H U N G U A N G, a Non-Party witness herein, having been first duly sworn by Terri Fudens, a Notary Public of the State of New York, was examined and testified as follows:</p> <p>EXAMINATION BY MS. DONNELLI:</p> <p>Q Please state your name for the record.</p> <p>A Chunguang Han. My last name is Han. My first name is Chunguang.</p> <p>MR. CHUFF: Chris Chuff for Eastern Profit Corporation Limited and the witness.</p> <p>MS. WANG: Yvette Wang from Golden Spring, New York, Ltd.</p> <p>MR. PODHASKIE: Daniel Podhaskie with Golden Spring, New York, Ltd.</p> <p>MS. DONNELLI: Eddie Greim and</p> <p style="text-align: right;">Page 5</p>

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<p>1 HAN CHUNGUANG 2 keep my questions as focused on those 3 topics as I can. But there's come 4 background that I think is necessary 5 to place this witness in the context 6 of those questions. I will try to 7 keep it focused. I do have some 8 background. 9 MR. CHUFF: Why is where he was 10 born relevant to the contract claim? 11 MS. DONNELLI: Well that's, I 12 think, in part to make the witness 13 sort of comfortable with getting to 14 know me and I'm getting to know him. 15 MR. CHUFF: Okay. 16 MS. DONNELLI: I will probably 17 have questions about his time here in 18 relation to the documents that he 19 signed. So I want to kind of place 20 his local where he was at certain 21 times. 22 MS. WANG: Can you please 23 translate, madam translator. 24 MS. CLINE: Thank you. 25 Q I believe the question was where were</p> <p>Page 10</p>	<p>1 HAN CHUNGUANG 2 this unless the court directs us to 3 do so. 4 MS. DONNELLI: We'll withdraw 5 the question. 6 MR. CHUFF: Thank you. 7 Q When you were living in China, did 8 you begin working for Eastern Profit? 9 A Okay. When I was working for this 10 company, it was in 2017. No. No. No. It was in 11 2015 or 2016. That's right. 12 Q Were you living in the United States 13 in 2015 or 2016? 14 A Not yet. At the time I was in Hong 15 Kong. 16 Q When did you begin living in the 17 United States? 18 A In 20 -- I'm not sure, but I have 19 been here for several years already. 20 Q Were you performing a role for 21 Eastern Profit while you were living in the United 22 States? 23 A I am an agent for them. 24 Q Were you an agent for Eastern Profit 25 while you have been living in the United States?</p> <p>Page 12</p>
<p>1 HAN CHUNGUANG 2 you born. 3 A In China. 4 Q Where in China? 5 A Shandong. S-H-A-N-D-O-N-G. 6 Q What brought you to the United 7 States? 8 MR. CHUFF: Objection. I'm not 9 going to allow the witness to testify 10 about this. The court has already 11 ordered that personal history and 12 reasons for coming to the United 13 States is clearly beyond the scope of 14 relevancy to these proceedings. And 15 I'm not going to allow him to answer 16 without the court ordering us to do 17 so. 18 I direct you to Docket 189, 19 page 7 where it says personal history 20 and reasons for coming to the United 21 States, defendant has not 22 demonstrated the relevance of this 23 topic. 24 So we're not going to allow the 25 witness to answer any questions about</p> <p>Page 11</p>	<p>1 HAN CHUNGUANG 2 A Before June, 2017 I was a director of 3 this company. However, in July that year, I 4 transferred it to -- Guo Mei ask me to be an agent 5 for this company after the transfer. 6 Q Before June, 2017, were you living in 7 the United States? 8 A I think so. 9 Q Have you lived in the United States 10 since June of 2017 and nowhere else? 11 A I am not sure, but I think I have 12 been moving around. 13 Q Within the United States? 14 A Yes. 15 Q Have you been back to China since 16 June of 2017 for any extended period? 17 MR. CHUFF: Objection to form. 18 Again, I'm going to cut this off 19 soon. It's not relevant to the 20 issues that the court allowed your 21 side to proceed on. 22 A No. 23 Q Where do you currently live? 24 A In United States. 25 Q What city?</p> <p>Page 13</p>

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<p>1 HAN CHUNGUANG</p> <p>2 A New York.</p> <p>3 Q What street?</p> <p>4 MR. CHUFF: Objection.</p> <p>5 Relevance and that's beyond the scope</p> <p>6 of what the court allowed.</p> <p>7 MS. DONNELLI: The court didn't</p> <p>8 make an order about this witness.</p> <p>9 The court made an order about</p> <p>10 Mr. Guo.</p> <p>11 Besides, at the most recent</p> <p>12 deposition, which was of Eastern</p> <p>13 Profit, the litigant, we heard</p> <p>14 testimony that this witness has</p> <p>15 involvement with Eastern Profit,</p> <p>16 significant involvement. So I'm</p> <p>17 exploring where he was located.</p> <p>18 MR. CHUFF: You have the city.</p> <p>19 Why do you need the street address?</p> <p>20 MS. DONNELLI: I routinely ask</p> <p>21 witnesses what their street address</p> <p>22 is.</p> <p>23 MR. CHUFF: I just don't see how</p> <p>24 it's relevant.</p> <p>25 MS. DONNELLI: If you're going</p> <p>Page 14</p>	<p>1 HAN CHUNGUANG</p> <p>2 it to you. But the court was very</p> <p>3 clear that he had limited involvement</p> <p>4 in issues in this case and has to be</p> <p>5 focused on the power of attorney, the</p> <p>6 ACA loan and the Strategic Vision</p> <p>7 Research Agreement.</p> <p>8 MS. DONNELLI: And that was an</p> <p>9 order entered upon a representation</p> <p>10 by your side of things about what</p> <p>11 this witness knew. And at our last</p> <p>12 deposition, which I know you didn't</p> <p>13 attend --</p> <p>14 MR. CHUFF: But I read.</p> <p>15 MS. DONNELLI: -- but you read,</p> <p>16 you will agree that there was</p> <p>17 testimony that this witness had</p> <p>18 significant involvement with Eastern</p> <p>19 Profit.</p> <p>20 MR. CHUFF: I would not agree</p> <p>21 that there was any testimony that he</p> <p>22 had significant involvement. Again,</p> <p>23 I don't think his street address is</p> <p>24 relevant.</p> <p>25 MS. DONNELLI: The testimony is</p> <p>Page 16</p>
<p>1 HAN CHUNGUANG</p> <p>2 to instruct him not to answer, that's</p> <p>3 one thing. But I caution you that</p> <p>4 that's a very common question to ask</p> <p>5 of a witness.</p> <p>6 MR. CHUFF: We've agreed to</p> <p>7 produce him at trial already. So you</p> <p>8 don't need to serve him with</p> <p>9 anything. It's beyond the scope.</p> <p>10 MS. DONNELLI: I'm trying to</p> <p>11 understand the context of where he's</p> <p>12 doing his work for this entity and to</p> <p>13 be able to understand where he lives.</p> <p>14 The time frame in question is</p> <p>15 important.</p> <p>16 MR. CHUFF: I agree. And that's</p> <p>17 why I let you get to New York City,</p> <p>18 because I understand the relevance of</p> <p>19 that. But if I don't understand the</p> <p>20 relevance of the street name, we're</p> <p>21 not going to allow it unless the</p> <p>22 court orders us to.</p> <p>23 And just to correct one thing,</p> <p>24 there is an oral order about</p> <p>25 Mr. Han's deposition, and I can read</p> <p>Page 15</p>	<p>1 HAN CHUNGUANG</p> <p>2 he was the boss of Eastern Profit.</p> <p>3 So anyway, I think it's relevant to</p> <p>4 understand where this witness resides</p> <p>5 so that we can see where he is at in</p> <p>6 relation to entities that have an</p> <p>7 association with Eastern Profit.</p> <p>8 MR. CHUFF: Until you've</p> <p>9 achieved that, I'm not going to allow</p> <p>10 him to answer about his street</p> <p>11 address.</p> <p>12 MS. DONNELLI: You're not going</p> <p>13 to allow him to answer his street</p> <p>14 address?</p> <p>15 MR. CHUFF: Not without the</p> <p>16 court directing me to do so.</p> <p>17 MS. DONNELLI: You're going to</p> <p>18 instruct the witness not to answer.</p> <p>19 I just want the record to be clear.</p> <p>20 MR. CHUFF: Yes.</p> <p>21 Q Since June of 2017, have you been</p> <p>22 living in the same location?</p> <p>23 A I don't think I have moved.</p> <p>24 Q You have been living in the same</p> <p>25 location here in New York since June of 2017;</p> <p>Page 17</p>

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<p>1 HAN CHUNGUANG</p> <p>2 correct?</p> <p>3 A I have stayed in New York.</p> <p>4 MS. DONNELLI: Can you repeat</p> <p>5 the question to the witness and ask</p> <p>6 him to answer the question?</p> <p>7 (Interpret complying)</p> <p>8 MR. CHUFF: Objection to form.</p> <p>9 A Yes.</p> <p>10 Q Do you own the place where you live,</p> <p>11 or do you rent the place where you live?</p> <p>12 MR. CHUFF: Objection. Form.</p> <p>13 A Rent.</p> <p>14 Q Does anyone live there with you</p> <p>15 today?</p> <p>16 MR. CHUFF: Objection. Again,</p> <p>17 this is way beyond the scope of what</p> <p>18 the court agreed that this witness</p> <p>19 could be produced to testify about.</p> <p>20 So unless the court changes its</p> <p>21 order by a request from you, I'm not</p> <p>22 going to allow him to testify about</p> <p>23 this stuff.</p> <p>24 MS. DONNELLI: As you know, the</p> <p>25 court is closed today. We're going</p> <p>Page 18</p>	<p>1 HAN CHUNGUANG</p> <p>2 he knows anything about those</p> <p>3 allegations. Maybe he knows</p> <p>4 something that relates to a defense</p> <p>5 on the claim as opposed to the</p> <p>6 counterclaim; right? But it's not to</p> <p>7 go off on just, you know, satisfying</p> <p>8 Mr. Greim's curiosity about, you</p> <p>9 know, what he might know about</p> <p>10 anything and everything in the</p> <p>11 universe that relates to Mr. Guo or</p> <p>12 the universe that relates to</p> <p>13 Mr. Chunguang, or the universe that</p> <p>14 relates to Miss Wang.</p> <p>15 This is, you know, the request</p> <p>16 that I've seen. I'm just going to</p> <p>17 say it as clear as I can, Mr. Greim,</p> <p>18 they are overbroad. You've got</p> <p>19 claims. You have to be able to</p> <p>20 articulate why something is relevant</p> <p>21 to a claim. You have --</p> <p>22 MS. DONNELLI: Counsel, I</p> <p>23 recognize you want to make a record,</p> <p>24 but you're taking up a lot of time to</p> <p>25 do that. And I think you're</p> <p>Page 20</p>
<p>1 HAN CHUNGUANG</p> <p>2 to have to do the best we can to make</p> <p>3 our respective positions for today,</p> <p>4 but we're not going to have a court</p> <p>5 order today.</p> <p>6 MR. CHUFF: Then he's not going</p> <p>7 to testify about this today.</p> <p>8 MS. DONNELLI: We'll preserve</p> <p>9 that and bring it up with the court</p> <p>10 as is appropriate.</p> <p>11 Q Are you married?</p> <p>12 MR. CHUFF: I'm sorry. I want</p> <p>13 to read something into the transcript</p> <p>14 given that we're not going to see the</p> <p>15 court today.</p> <p>16 This is the August 24, 2019</p> <p>17 transcript. The dispute for contacts</p> <p>18 was whether Mr. Han could be or would</p> <p>19 even be produced as a witness. And</p> <p>20 this is what the court ruled:</p> <p>21 This is not a case where</p> <p>22 Mr. Chunguang is accused of</p> <p>23 wrongdoing personally. It's a case</p> <p>24 where Eastern is accused of wrong</p> <p>25 doing. And the question is whether</p> <p>Page 19</p>	<p>1 HAN CHUNGUANG</p> <p>2 borderline on obstructing this</p> <p>3 deposition.</p> <p>4 So I ask that you keep your</p> <p>5 objections to nonspeaking objections</p> <p>6 for the record and that we move on.</p> <p>7 MR. CHUFF: Right.</p> <p>8 So you've disputed what the</p> <p>9 ruling is then, and I wanted to make</p> <p>10 that clear on the record. From now</p> <p>11 on I won't reread it, but I just</p> <p>12 wanted to make that clear.</p> <p>13 MS. DONNELLI: Thank you.</p> <p>14 Q Does the address 781 Fifth Avenue,</p> <p>15 Suite 1801, New York City mean anything to you?</p> <p>16 A Nothing.</p> <p>17 Q Have you ever lived at that address?</p> <p>18 MR. PODHASKIE: Objection. Move</p> <p>19 on, counsel. I just read into the</p> <p>20 record that it has to be relevant to</p> <p>21 the claim.</p> <p>22 MS. DONNELLI: It is relevant</p> <p>23 and I'll tell you why it's relevant.</p> <p>24 Because we've connected that address</p> <p>25 with a key fact witness, and we</p> <p>Page 21</p>

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<p>1 HAN CHUNGUANG 2 believe this witness has a 3 relationship with that witness. So I 4 ask if the witness will answer the 5 question. 6 MR. CHUFF: I'm instructing him 7 not to answer. This is not relevant 8 to any of the issues, and the court 9 has been very clear that this has to 10 be a very narrow deposition with his 11 involvement with the issues in this 12 case. And this has nothing to do 13 with the contracts at issue. 14 MS. DONNELLI: You haven't even 15 let me establish where it might go. 16 You're just instructing the witness 17 not to answer. 18 MR. CHUFF: Explain it to me, 19 because I'm not seeing the relevance. 20 MS. DONNELLI: Because we 21 believe that that is an address 22 connected with Guo Wengui, and we 23 think that this witness has a 24 relationship with Guo Wengui that is 25 deeper than perhaps your objections</p> <p>Page 22</p>	<p>1 HAN CHUNGUANG 2 know, what he might know about 3 anything and everything in the 4 universe that relates to -- 5 MS. DONNELLI: Counsel, you just 6 read that again for a second time. 7 You're obstructing this deposition. 8 MR. CHUFF: That's exactly what 9 you're doing. I'm not wasting my 10 time. 11 MS. DONNELLI: You read that 12 twice and I asked you to not obstruct 13 the deposition. I'm surprised that 14 you are frankly, but you are. 15 MR. CHUFF: I'm surprised that 16 after I read it the first time you're 17 still asking these questions. 18 MS. DONNELLI: Let's just move 19 on. 20 Q Do you know a Guo Wengui? 21 A Yes. 22 Q How do you know that name? 23 A In 2009 I went to visit Mr. Guo 24 Wengui not Guo Pangu because of his 25 representation.</p> <p>Page 24</p>
<p>1 HAN CHUNGUANG 2 are intended to convey. 3 So you're not even letting me 4 get into anything, and you're 5 instructing a witness not to answer, 6 a fact witness not to answer. And 7 that, I believe, is a dangerous 8 ground. 9 MR. CHUFF: How is that relevant 10 whether the contract been breached? 11 MS. DONNELLI: I just explained 12 it. The context of this witness' 13 involvement with these contracts with 14 the people these contracts involved 15 is important. You're not even 16 letting me go anywhere. 17 MR. CHUFF: The contracts, I 18 agree with you. But that's not what 19 you're asking. 20 MS. DONNELLI: All right. 21 MR. CHUFF: I'll only add one 22 sentence. This is what the Judge 23 said: This deposition is not to go 24 off on just, you know, satisfying 25 Mr. Greim's curiosity about, you</p> <p>Page 23</p>	<p>1 HAN CHUNGUANG 2 Because of my adoration for him, I 3 learned investment architecture, art and 4 everything else from him, Pangu. 5 Q Was Mr. Guo your mentor? 6 A Yes. A mentor. 7 Q What is the nature of your 8 relationship with Mr. Guo while you've been living 9 in the United States? 10 A Our relationship after all is about 11 my learning from him, my learning about investment 12 and how to do things from him. 13 Q Is it your testimony that you have 14 never been in the Sherry Netherland building here 15 in New York City? 16 MR. CHUFF: Objection. 17 Mischaracterizes testimony. 18 A I don't understand your question. 19 Q Have you ever been in the Sherry 20 Netherland building here in New York City? 21 A Yes. 22 Q For what reason? 23 A Because Mr. Guo was there. I went to 24 learn from him about -- just about everything. 25 Q Have you lived in the Sherry</p> <p>Page 25</p>

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<p>1 HAN CHUNGUANG 2 Netherlands location with Mr. Guo? 3 MR. PODHASKIE: Objection to 4 form. 5 A No. 6 Q Has Mr. Guo ever employed you? 7 A Did Mr. Guo employ me? What do you 8 mean by that? 9 Q Have you performed any jobs for 10 Mr. Guo for which you have been paid? 11 A No. 12 Q Have you received any form of 13 compensation from Mr. Guo? 14 A No. 15 Q Over the last year, how often have 16 you seen Mr. Guo, meaning every day, once a month? 17 MR. CHUFF: Okay. Objection. 18 Apparently I have to read the 19 transcript the third time. This is 20 exactly what the court said you may 21 not delve into. I'm not allowing the 22 witness to answer it. 23 Q Under what context have you seen 24 Mr. Guo over the last year? 25 MR. CHUFF: Unless it's related</p> <p>Page 26</p>	<p>1 HAN CHUNGUANG 2 then ask more specific questions. 3 Are you still instructing this 4 witness, a fact witness, not to 5 answer? 6 MR. CHUFF: Can you repeat the 7 question? 8 (The requested portion of the 9 record was read back by the 10 reporter.) 11 MR. CHUFF: I withdraw the 12 instruction not to answer that 13 question. 14 (The requested portion of the 15 record was read back by the 16 reporter.) 17 A I don't think this question has 18 anything to do with this case; right? 19 Q The counsel today for you has 20 instructed you to answer. 21 MR. CHUFF: I withdrew my 22 instruction not to answer. 23 A I have followed Mr. Guo for a long 24 time. 25 Q For what purpose?</p> <p>Page 28</p>
<p>1 HAN CHUNGUANG 2 to Eastern Profit or the contracts at 3 issue in this case, I direct you not 4 to answer. 5 MS. DONNELLI: How am I to know 6 the answer? 7 MR. CHUFF: Qualify the question 8 to regarding Eastern Profit or 9 regarding the contracts. It's 10 appropriate, but this is a fishing 11 expedition. 12 Q How long were you living in the 13 United States before you began interacting with 14 Mr. Guo? 15 MR. CHUFF: Same instruction 16 unless it's related to the issues in 17 this case including Eastern Profit 18 and the contract. 19 MS. DONNELLI: We have evidence 20 that this witness has involvement 21 with Mr. Guo in relation to these 22 documents that we'll be talking about 23 today that bear his name. 24 I'm asking a general question to 25 understand the witness' testimony to</p> <p>Page 27</p>	<p>1 HAN CHUNGUANG 2 A Again, I learned things from him. I 3 admire Mr. Guo a lot. Mr. Guo is my idol. 4 Mr. Guo is my mentor. I learned the stuff I have 5 testified to before from him. 6 MS. DONNELLI: Can you read the 7 question that asked how long were you 8 here in the United States before you 9 began interacting with Mr. Guo. 10 (The requested portion of the 11 record was read back by the 12 reporter.) 13 MR. CHUFF: Objection to form. 14 A I continue having interactions with 15 Mr. Guo. 16 Q Did you come to the United States to 17 be with Mr. Guo? 18 A The reason I have been with Mr. Guo 19 is because I wanted to learn from Mr. Guo. I am 20 learning investment from Mr. Guo. And Mr. Guo 21 also shows me how to do things. 22 Q Investment in what? 23 A Investment in terms of regular 24 business activity. 25 Q In what industry?</p> <p>Page 29</p>

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<p>1 HAN CHUNGUANG 2 MR. CHUFF: I'm sorry. 3 Objection. What Mr. Han is learning 4 from Mr. Guo has nothing to do with 5 any of the issues. 6 MS. DONNELLI: Why don't you 7 make an objection for the record. 8 MR. CHUFF: I'm explaining why 9 I'm instructing him not to answer 10 these questions. 11 MS. DONNELLI: All right. Why 12 don't you just instruct him not to 13 answer, because this whole process is 14 obstructing this deposition. So why 15 don't you instruct him not to answer. 16 There's no need to go further than 17 that. We'll take it up with the 18 judge. 19 MR. CHUFF: It's beyond the 20 scope of what the court ordered. 21 MS. DONNELLI: This whole 22 process is obstructing this 23 deposition. 24 So why don't you instruct him 25 not to answer. There's no need to go</p> <p>Page 30</p>	<p>1 HAN CHUNGUANG 2 You're instructing this witness 3 not to answer a question about this 4 witness' testimony to a question. 5 You allowed him to answer. 6 MR. CHUFF: I'm not allowing 7 you to explore his relationship with 8 Mr. Guo that has nothing to do 9 with -- 10 MS. DONNELLI: It is a yes or no 11 question I've asked you. 12 MR. CHUFF: Okay. I'm going to 13 give you my answer. I'm instructing 14 the witness not to answer a question 15 that is beyond what the court ordered 16 him to appear for. And it's not 17 related to Eastern Profit or the 18 contracts at issue in this case. His 19 relationship with Mr. Guo, outside of 20 this case, has nothing to do with 21 anything. 22 MS. DONNELLI: Well, counsel, 23 your witness here has already 24 testified that he had a role with 25 Eastern Profit, and I'm entitled to</p> <p>Page 32</p>
<p>1 HAN CHUNGUANG 2 further than that. We'll take it up 3 with the judge. 4 MR. CHUFF: I instruct him not 5 to answer. 6 Q Do you pay Mr. Guo to teach you about 7 investment? 8 MR. CHUFF: Objection. 9 Relevance. Beyond the scope of the 10 order. I instruct him not to answer. 11 MS. DONNELLI: So you're going 12 to instruct the witness not to answer 13 a question that follows up on the 14 very words the witness used to a 15 question you allowed. I want to be 16 sure I understand your position. 17 The witness testified to this 18 information. I'm asking him about 19 it. 20 MR. CHUFF: I tried to give you 21 some leeway, but this is completely 22 irrelevant and contrary to what the 23 court ordered about the deposition. 24 MS. DONNELLI: I want to make 25 sure I understand.</p> <p>Page 31</p>	<p>1 HAN CHUNGUANG 2 understand if investment was relating 3 to that. 4 MR. CHUFF: You asked him about 5 his mentorship relationship with 6 Mr. Guo. He said he's learning 7 investments. You're asking about 8 what investments. 9 MS. DONNELLI: There's nothing 10 improper about that. 11 MR. CHUFF: You're not asking 12 Eastern Profit's investments. 13 You're asking about what he's 14 learning from Mr. Guo. That's 15 completely improper and it's a 16 fishing expedition beyond the scope 17 of what the court ordered. 18 Q Do the investment matters that 19 Mr. Guo teaches you about involve Eastern Profit? 20 A No. 21 Q You testified that Mr. Guo teaches 22 you how to do things. Do those things involve 23 Eastern Profit? 24 A No. What Mr. Guo taught me was to 25 give me a direction. He didn't teach me anything</p> <p>Page 33</p>

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<p>1 HAN CHUNGUANG</p> <p>2 specific.</p> <p>3 Q Have you ever discussed Eastern</p> <p>4 Profit with Mr. Guo?</p> <p>5 A No.</p> <p>6 Q Does the address 162 East 64th</p> <p>7 Street, New York City mean anything to you?</p> <p>8 A I have heard about it.</p> <p>9 Q What do you understand it to be?</p> <p>10 A I was in the lobby of this building</p> <p>11 to meet Yvette and discussed about paying back a</p> <p>12 loan.</p> <p>13 Q A loan to whom?</p> <p>14 A I borrowed money from William, and</p> <p>15 William was asking me to pay him back. That was</p> <p>16 the matter I brought it up with Yvette in the</p> <p>17 lobby of this building.</p> <p>18 Q Did you or Eastern Profit borrow the</p> <p>19 money you're referring to?</p> <p>20 A The company did.</p> <p>21 Q How often do you meet with Mr. Guo</p> <p>22 for him to mentor you and teach you how to do</p> <p>23 things?</p> <p>24 MR. CHUFF: Objection. For the</p> <p>25 reasons I've already discussed, I</p> <p>Page 34</p>	<p>1 HAN CHUNGUANG</p> <p>2 A The business is a family trust.</p> <p>3 Therefore, I would say I've been working for it</p> <p>4 for a long time.</p> <p>5 Q Since you've been in the United</p> <p>6 States?</p> <p>7 A Yes.</p> <p>8 Q Does it have any involvement with</p> <p>9 Eastern Profit?</p> <p>10 A No.</p> <p>11 Q Is the name of the company Golden</p> <p>12 Spring New York Limited?</p> <p>13 A I don't understand your question.</p> <p>14 Can you rephrase your question?</p> <p>15 Q Does a company called Golden Spring</p> <p>16 New York employ you?</p> <p>17 A No.</p> <p>18 Q Has that company ever employed you?</p> <p>19 A No. But again, I'm not sure. My</p> <p>20 recollection is not clear.</p> <p>21 Q Has a company called Golden Spring</p> <p>22 Hong Kong Limited ever employed you?</p> <p>23 A No.</p> <p>24 Q If I represented to you that Golden</p> <p>25 Spring New York Limited employed Yvette Wang,</p> <p>Page 36</p>
<p>1 HAN CHUNGUANG</p> <p>2 instruct the witness not to answer</p> <p>3 unless counsel can direct it to some</p> <p>4 kind of relevance to Eastern Profit.</p> <p>5 Q Do you know who Guo Mei is?</p> <p>6 A Yes.</p> <p>7 Q Is Guo Mei Mr. Guo's daughter?</p> <p>8 A Yes.</p> <p>9 Q Does Guo Mei have a relationship with</p> <p>10 Eastern Profit?</p> <p>11 A Guo Mei is a director of Eastern</p> <p>12 Profit right now.</p> <p>13 Q Have you ever discussed Guo Mei's</p> <p>14 role with Eastern Profit with Mr. Guo?</p> <p>15 A No. I have never had such a</p> <p>16 discussion with Mr. Guo.</p> <p>17 Q Do you have a job at this time?</p> <p>18 A Do I have a job right now? Yes.</p> <p>19 Q Where are you employed?</p> <p>20 A I work for my own company.</p> <p>21 Q What is your company called?</p> <p>22 A Since this has nothing to do with</p> <p>23 this case, I'm not going to answer this question.</p> <p>24 Q How long have you been employed by</p> <p>25 your company?</p> <p>Page 35</p>	<p>1 HAN CHUNGUANG</p> <p>2 would that refresh your recollection whether it</p> <p>3 has employed you?</p> <p>4 A I did ask Yvette to do something for</p> <p>5 me. And she is or was involved with Golden Spring</p> <p>6 New York.</p> <p>7 THE INTERPRETER: Interpreter</p> <p>8 note in Chinese we don't have a</p> <p>9 tense. In China no present, or past,</p> <p>10 or future things.</p> <p>11 Q When you met with Yvette Wang to</p> <p>12 discuss a loan, was she there personally or for</p> <p>13 Golden Spring New York?</p> <p>14 A She represented the company.</p> <p>15 Q Golden Spring New York?</p> <p>16 A Yes.</p> <p>17 Q Why would you be speaking with Golden</p> <p>18 Spring New York about a loan?</p> <p>19 A It is not like I was speaking to</p> <p>20 Golden Spring New York. I was speaking</p> <p>21 specifically to Yvette as far as what capacity</p> <p>22 Yvette represented, it had nothing to do with me.</p> <p>23 Q Do you know who Yvette represented</p> <p>24 during that meeting?</p> <p>25 A Which meeting again?</p> <p>Page 37</p>

10 (Pages 34 to 37)

Han Chunguang  
November 11, 2019

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<p>1 HAN CHUNGUANG</p> <p>2 Q You testified about meeting Yvette</p> <p>3 Wang in the lobby to discuss a loan.</p> <p>4 A What's your question? I won't</p> <p>5 qualify the discussion as a meeting. I chatted</p> <p>6 with her briefly.</p> <p>7 Q When you say briefly, how long was</p> <p>8 it?</p> <p>9 A Around 20 minutes at the most. 20</p> <p>10 some minutes.</p> <p>11 Q Was anyone else present besides you</p> <p>12 and Yvette?</p> <p>13 A No.</p> <p>14 Q How did you know to meet with Yvette?</p> <p>15 A I don't understand her question.</p> <p>16 What do you mean how did I know to meet with</p> <p>17 Yvette?</p> <p>18 Q Why did you meet with Yvette rather</p> <p>19 than Mr. Guo?</p> <p>20 A That day I went there to see Mr. Guo</p> <p>21 who stayed there at the time. I bumped into</p> <p>22 Yvette in the lobby. I brought up the subject</p> <p>23 that William was asking me to pay back a loan, and</p> <p>24 I chatted with her briefly.</p> <p>25 Q Why did you think that Yvette knew</p> <p style="text-align: right;">Page 38</p>	<p>1 HAN CHUNGUANG</p> <p>2 MS. WANG: She just called me a</p> <p>3 bitch just now. She said that. I</p> <p>4 want it on the record. I'm sorry.</p> <p>5 MR. PODHASKIE: I didn't hear.</p> <p>6 MR. GREIM: Let's stop and get</p> <p>7 an answer to this question.</p> <p>8 A At the time when I hired an</p> <p>9 investigation company, and Yvette told me I needed</p> <p>10 money to hire the company, that was why I borrowed</p> <p>11 from William.</p> <p>12 When William ask me to return the</p> <p>13 money, I had to bring it up with Yvette because</p> <p>14 Yvette was telling me somehow we got misled. And</p> <p>15 I wanted her to know results of investigation we</p> <p>16 received. I have to know. I have to tell Yvette</p> <p>17 about it.</p> <p>18 Q I have one more question, and then we</p> <p>19 can take a restroom break. You have been</p> <p>20 referring to William. What is William's full</p> <p>21 name?</p> <p>22 A William.</p> <p>23 Q Can you please spell that?</p> <p>24 A YU. I think Y-U.</p> <p>25 Q Is William Yu the same person as</p> <p style="text-align: right;">Page 40</p>
<p>1 HAN CHUNGUANG</p> <p>2 anything about the loan?</p> <p>3 A I don't understand your question.</p> <p>4 What do you mean?</p> <p>5 Q You met with Yvette to discuss the</p> <p>6 loan because you believed she knew about the loan;</p> <p>7 correct?</p> <p>8 A I hired a company to investigate a</p> <p>9 matter for me, and I asked Yvette to handle it for</p> <p>10 me. At the time I borrowed money from William to</p> <p>11 hire this investigation company. However, the</p> <p>12 investigation didn't go anywhere.</p> <p>13 William was asking me to pay back the</p> <p>14 loan. When I bumped into Yvette, I have to tell</p> <p>15 Yvette what was going on.</p> <p>16 Q Why did you choose Yvette to tell</p> <p>17 this to?</p> <p>18 A By the way, can I go to the bathroom</p> <p>19 first.</p> <p>20 Q In a few minutes we will take a</p> <p>21 break, but please answer the question.</p> <p>22 A Can you repeat your question?</p> <p>23 (The requested portion of the</p> <p>24 record was read back by the</p> <p>25 reporter.)</p> <p style="text-align: right;">Page 39</p>	<p>1 HAN CHUNGUANG</p> <p>2 William Je, J-E?</p> <p>3 A I have no idea.</p> <p>4 Q When you've been using the name</p> <p>5 William today since we've been talking, have you</p> <p>6 always been referring to William Yu?</p> <p>7 A Yes. Yes, I think so.</p> <p>8 MS. DONNELLI: Thank you. You</p> <p>9 requested a bathroom break. I would</p> <p>10 like to break for no more than 10</p> <p>11 minutes.</p> <p>12 (At this time, a brief recess</p> <p>13 was taken.)</p> <p>14 CONTINUED EXAMINATION</p> <p>15 BY MS. DONNELLI:</p> <p>16 Q We are here after taking a break.</p> <p>17 Is Golden Spring New York's business</p> <p>18 office located at 162 East 64th Street?</p> <p>19 A I don't know.</p> <p>20 Q Why were you able to meet Yvette Wong</p> <p>21 in that building if that's not where Golden Spring</p> <p>22 New York does its business?</p> <p>23 A I don't understand your question.</p> <p>24 Q You testified that you bumped into</p> <p>25 Yvette in that building, and I'm asking what</p> <p style="text-align: right;">Page 41</p>

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<p>1 HAN CHUNGUANG 2 caused her to be in that building. 3 A I don't know. You have to ask her. 4 It happened that I bumped into her that day, and I 5 talked to her about this matter. That was it. 6 You have to ask her why. 7 Q Where is your place of work located? 8 A My place of work? 9 Q Yes. 10 A I'm not at liberty to disclose that 11 here. 12 Q Is your place of work 162 East 64th 13 Street? 14 A No. 15 Q Why are you not at liberty to 16 disclose your place of work? 17 MR. CHUFF: Objection. Form. 18 A What I'm concerned is that once my 19 information is revealed, the communist party will 20 also learn about it too. 21 Q Is your place of work the same place 22 of work of the family trust? 23 A Your question is rather vague. I 24 don't know how to answer your question. 25 MS. DONNELLI: Can you read the</p> <p>Page 42</p>	<p>1 HAN CHUNGUANG 2 Eastern Profit? 3 A Yes. I got permission from Guo Mei, 4 and I authorized Yvette to handle this particular 5 matter for me, which was a matter of hiring and 6 investigation company. 7 Q Is that the only involvement that 8 Yvette had with Eastern Profit? 9 A I'm so sorry. Can you repeat your 10 question. 11 (The requested portion of the 12 record was read back by the 13 reporter.) 14 A In terms of all matters related to 15 the investigation company, I gave my authorization 16 to Yvette so that she could act on my behalf. 17 Q Did Yvette do anything for Eastern 18 Profit other than related to the investigation 19 company? 20 A No. No, because this company of mine 21 was frozen in Hong Kong and that was all I asked 22 her to do for me. 23 Q Going back to this meeting that you 24 had with Yvette at 162 East 64th Street, when did 25 it occur?</p> <p>Page 44</p>
<p>1 HAN CHUNGUANG 2 question back. 3 (The requested portion of the 4 record was read back by the 5 reporter.) 6 A In terms of her question, I don't 7 know how to answer it. 8 Q When you performed things for Eastern 9 Profit, did you do that at 162 East 64th Street? 10 A No. 11 Q Where were you located when you 12 performed the things you did for Eastern Profit? 13 A The headquarter of this company was 14 in Hong Kong. However, I could choose anywhere I 15 wanted to work for this company. I was quite 16 free. 17 Q Where did you choose to do your work 18 for Eastern Profit? 19 A When I took over this company, I was 20 in Hong Kong. 21 Q Did you perform any work for Eastern 22 Profit anywhere other than Hong Kong? 23 A In New York, I asked Yvette to do 24 thing for me on behalf of this company. 25 Q When you say "this company," you mean</p> <p>Page 43</p>	<p>1 HAN CHUNGUANG 2 A Several months ago, I think. 3 Q In the year 2019? 4 A Yes. 5 Q Other than that meeting, did you ever 6 speak with or communicate with Yvette about the 7 loan? 8 A I don't remember. 9 Q The work that you currently do for 10 the family trust, is that the type of work you did 11 for Eastern Profit? 12 A Again, since your question is related 13 to what my family trust is doing, I am not at 14 liberty to answer your question here. 15 Q Why not? 16 A Again, I'm concerned about my safety. 17 If I reveal too much information about myself, the 18 communist party eventually will also learn about 19 it too. 20 Q You called this your, Y-O-U-R, family 21 trust. Is it the Han Family Trust that you work 22 for? 23 A My answer will be the same as what I 24 have given to you, to your previous answer -- to 25 your previous question.</p> <p>Page 45</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Q You testified that you had to get</p> <p>3 permission from Guo Mei to authorize Yvette to do</p> <p>4 things for Eastern Profit.</p> <p>5 MR. CHUFF: Objection to form.</p> <p>6 Q Why did Guo Mei not simply go</p> <p>7 directly to Yvette rather than through you?</p> <p>8 A Guo Mei was very busy. Guo Mei gave</p> <p>9 me the authorization to handle things for her, and</p> <p>10 then I give the authorization to Yvette to do</p> <p>11 things for me. It was very logic. This was the</p> <p>12 way I did my business.</p> <p>13 Q Was any of the instruction that</p> <p>14 Mr. Guo gave you about investments helpful to you</p> <p>15 in your role with Eastern Profit?</p> <p>16 MR. CHUFF: Objection. Form.</p> <p>17 A Yes. He has been teaching me a lot.</p> <p>18 He has given me knowledge. And whatever I learn</p> <p>19 from him I'll apply it to the rest of my life to</p> <p>20 apply it to my company, to apply it to my business</p> <p>21 model.</p> <p>22 Q Why did you not apply it to Eastern</p> <p>23 Profit and instead got Yvette involved?</p> <p>24 MR. PODHASKIE: Objection to</p> <p>25 form.</p> <p>Page 46</p>	<p>1 HAN CHUNGUANG</p> <p>2 A I think she was in New York, but I'm</p> <p>3 not sure. Basically I had a phone conversation</p> <p>4 with her, or I had phone conversations with her.</p> <p>5 I was not sure where she was.</p> <p>6 THE INTERPRETER: Interpreter</p> <p>7 note in Chinese we don't have a</p> <p>8 singular or plurals. Therefore the</p> <p>9 interpreter does not know how many</p> <p>10 phone conversation had with Miss Guo.</p> <p>11 Q When were the phone conversations?</p> <p>12 A In 2017. Also in 2018. There were</p> <p>13 phone conversations in recent years.</p> <p>14 Q Can you be more specific as far as</p> <p>15 even a month in those years?</p> <p>16 A Again, I don't remember the</p> <p>17 specifics. But I do remember in last few years I</p> <p>18 spoke with her over the phone.</p> <p>19 Q Were you working for the family trust</p> <p>20 when you spoke with Guo Mei about this?</p> <p>21 A Yes. Continually.</p> <p>22 Q Why did you not choose someone from</p> <p>23 the family trust to help you rather than choosing</p> <p>24 Yvette?</p> <p>25 A This was due to a business</p> <p>Page 48</p>
<p>1 HAN CHUNGUANG</p> <p>2 A Firstly, my English is not great. I</p> <p>3 need someone in New York to help me. Therefore, I</p> <p>4 authorize Yvette to handle things for me. It was</p> <p>5 as simple as that.</p> <p>6 Q When you say handle, I understood you</p> <p>7 to mean that Yvette had your full authority. Do</p> <p>8 you mean something less than that?</p> <p>9 A I got full authorization to Yvette to</p> <p>10 handle the matters was this liar company.</p> <p>11 Q You testified that Guo Mei authorized</p> <p>12 you. Was that authorization in writing?</p> <p>13 A What do you mean, written</p> <p>14 authorization?</p> <p>15 Q Yes.</p> <p>16 A No. Orally.</p> <p>17 Q Where was Guo Mei located when she</p> <p>18 gave you the permission to authorize Yvette to</p> <p>19 undertake things that we've discussed?</p> <p>20 MR. CHUFF: Objection. Form.</p> <p>21 THE INTERPRETER: The</p> <p>22 interpreter needs clarification from</p> <p>23 the witness to repeat last sentence</p> <p>24 because the interpreter did not hear</p> <p>25 it clearly.</p> <p>Page 47</p>	<p>1 HAN CHUNGUANG</p> <p>2 consideration.</p> <p>3 Q Which was what?</p> <p>4 A This is rather personal. I don't</p> <p>5 think I should tell you my business' strategies</p> <p>6 was. I don't think I want to review it here.</p> <p>7 Q Did you have personal interests in</p> <p>8 Eastern Profit?</p> <p>9 MR. CHUFF: Objection. Form.</p> <p>10 A When you say personal interest, what</p> <p>11 do you mean by that?</p> <p>12 Q I was trying to understand your</p> <p>13 answer, why something on a personal level affected</p> <p>14 your decision for Eastern Profit.</p> <p>15 A I still don't understand your</p> <p>16 question. What do you mean that my personal way</p> <p>17 of thinking affected my involvement with the</p> <p>18 company?</p> <p>19 Q We will get to that more later.</p> <p>20 Does the address 800 Fifth Avenue,</p> <p>21 Suite 21F mean anything to you?</p> <p>22 A No.</p> <p>23 Q We've been speaking about an entity</p> <p>24 called Eastern Profit; true?</p> <p>25 A Yes.</p> <p>Page 49</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Q What is the full name of that entity?</p> <p>3 A Eastern Profit.</p> <p>4 Q Do you know that entity to have any</p> <p>5 other names?</p> <p>6 A I'm not sure.</p> <p>7 Q Your understanding is that the</p> <p>8 entity's name is Eastern Profit; correct?</p> <p>9 A Yes.</p> <p>10 Q No other words in its name; correct?</p> <p>11 A No.</p> <p>12 Q When was Eastern Profit formed?</p> <p>13 A I acquired it somewhere around the</p> <p>14 end of 2014. I purchased it for someone, but I</p> <p>15 didn't know whether the company had another name</p> <p>16 or not before my purchase of it.</p> <p>17 Q When was your purchase of Eastern</p> <p>18 Profit?</p> <p>19 A I think the end of 2014.</p> <p>20 Q Had you had any involvement with</p> <p>21 Eastern Profit prior to the end of 2014?</p> <p>22 A No.</p> <p>23 Q Who did you acquire it from?</p> <p>24 A From a friend of mine.</p> <p>25 Q What was the name of the friend?</p> <p style="text-align: right;">Page 50</p>	<p>1 HAN CHUNGUANG</p> <p>2 did everything in a legal sense?</p> <p>3 MR. CHUFF: Objection. Form.</p> <p>4 A Yes. When I purchased this company</p> <p>5 for my friend, I was going to use it to do</p> <p>6 investment business. Of course I wanted to do it</p> <p>7 right. I wanted to do it legally. I wanted to do</p> <p>8 it in sound business.</p> <p>9 Q What review or research did you do</p> <p>10 before purchasing Eastern Profit to assure</p> <p>11 yourself that it had, in fact, done things</p> <p>12 legally?</p> <p>13 A I was to acquire this company. I did</p> <p>14 some analysis and performance evaluation. I did</p> <p>15 it also based upon my experience. By the way, it</p> <p>16 was a company legally listed. Why would it not do</p> <p>17 things legally?</p> <p>18 Q Did Mr. Guo provide you guidance or</p> <p>19 advice when you were reviewing Eastern Profit to</p> <p>20 purchase it?</p> <p>21 A No, not anything specific.</p> <p>22 Q Did you inform Mr. Guo that you were</p> <p>23 intending to purchase Eastern Profit before you</p> <p>24 purchased it?</p> <p>25 A No.</p> <p style="text-align: right;">Page 52</p>
<p>1 HAN CHUNGUANG</p> <p>2 A The last name Xu, X-U. Z-H-A-O,</p> <p>3 H-U-I, X-U.</p> <p>4 THE INTERPRETER: The</p> <p>5 interpreter is spelling, which may</p> <p>6 not be the official spelling.</p> <p>7 MS. DONNELLI: Thank you.</p> <p>8 Q Why did you purchase Eastern Profit?</p> <p>9 A At the time I had just got to Hong</p> <p>10 Kong. I wanted to open the international market.</p> <p>11 Therefore, I acquired this company. I wanted to</p> <p>12 use this company to do some investments.</p> <p>13 Q Investments in what industry?</p> <p>14 A Everything, as long as they were</p> <p>15 legal and could be profitable.</p> <p>16 Q Why did you choose to purchase</p> <p>17 Eastern Profit rather than another company?</p> <p>18 A Because I knew this friend of mine.</p> <p>19 I knew about him and I kind of knew his business.</p> <p>20 And this company was just a regular</p> <p>21 company who did everything legally right. But the</p> <p>22 decision was based upon logic and no more business</p> <p>23 consideration.</p> <p>24 Q What research did you do, if any,</p> <p>25 before purchasing Eastern Profit to know that it</p> <p style="text-align: right;">Page 51</p>	<p>1 HAN CHUNGUANG</p> <p>2 Q Did Mr. Guo provide you the</p> <p>3 compensation needed to purchase Eastern Profit?</p> <p>4 A No.</p> <p>5 Q When you were performing your</p> <p>6 analysis and evaluation, did you review any</p> <p>7 written materials from Eastern Profit?</p> <p>8 A At the time in Hong Kong I had an</p> <p>9 agent. I had this agent of mine to do all the</p> <p>10 things for me.</p> <p>11 Q What was the name of the agent?</p> <p>12 A Natasha.</p> <p>13 THE INTERPRETER: Interpreter</p> <p>14 note interpreter earlier</p> <p>15 misinterpreted the person's gender.</p> <p>16 Obviously right now we know the</p> <p>17 gender is a woman. The reason it's</p> <p>18 not in Chinese, we don't have a</p> <p>19 gender.</p> <p>20 Q What was Natasha's last name?</p> <p>21 A Natasha's last name is Q-U, which may</p> <p>22 not be the official last name. I don't know how</p> <p>23 to spell it. I only know she called herself</p> <p>24 Natasha. It's an English name, Natasha.</p> <p>25 Q What was Natasha's Chinese name?</p> <p style="text-align: right;">Page 53</p>



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<p>1 HAN CHUNGUANG</p> <p>2 A I don't know.</p> <p>3 Q Who did Natasha work for?</p> <p>4 A What do you mean by that?</p> <p>5 Q Natasha performed a service for you.</p> <p>6 Who did she work for?</p> <p>7 A I didn't know what company she was</p> <p>8 working for. However, I knew him. I trusted him.</p> <p>9 In Hong Kong I gave her the authorization to</p> <p>10 handle my stuff for me in Hong Kong.</p> <p>11 Q Did she report to you about her</p> <p>12 review of Eastern Profit before you purchased it?</p> <p>13 A I think so. But to tell you the</p> <p>14 truth, I don't remember because it was a long time</p> <p>15 ago. I would say that I trusted her. In Chinese,</p> <p>16 trust is everything.</p> <p>17 Since I trusted her, I gave her full</p> <p>18 authorization to handle matters for me in Hong</p> <p>19 Kong.</p> <p>20 Q Did you put that authorization in</p> <p>21 writing?</p> <p>22 A Yes.</p> <p>23 Q What had Natasha done to earn your</p> <p>24 trust?</p> <p>25 A I met her. Also I met her in social</p> <p style="text-align: right;">Page 54</p>	<p>1 HAN CHUNGUANG</p> <p>2 talk about that.</p> <p>3 Q We'll talk about that later.</p> <p>4 How much did you pay for Eastern</p> <p>5 Profit?</p> <p>6 A 1,000 Hong Kong currency. 1,000 HK</p> <p>7 currency.</p> <p>8 Q Was that worth around 200 U.S.</p> <p>9 dollars?</p> <p>10 A I don't know about exchange rate back</p> <p>11 then. This number is what I can remember right</p> <p>12 now. All the details about the purchase of the</p> <p>13 company was handled by Natasha. I didn't know</p> <p>14 most of the details.</p> <p>15 Q What was Eastern Profit's</p> <p>16 capitalization?</p> <p>17 MR. CHUFF: Objection. The</p> <p>18 court has already said that the</p> <p>19 financial identity of Eastern Profit</p> <p>20 is off limits. Docket entry 189,</p> <p>21 page 4. To the extent the defendant</p> <p>22 seeks to further -- inquire further</p> <p>23 regarding plaintiff's financial</p> <p>24 situation is a request for a leave to</p> <p>25 do so. Denied again for failure to</p> <p style="text-align: right;">Page 56</p>
<p>1 HAN CHUNGUANG</p> <p>2 settings. From what I learned about her, I felt</p> <p>3 that she was someone that I could trust.</p> <p>4 Q You testified that you purchased</p> <p>5 Eastern Profit to make investments. Once you</p> <p>6 purchased Eastern Profit, did it make any</p> <p>7 investments?</p> <p>8 A Yes, some.</p> <p>9 Q What were they?</p> <p>10 A I'm not at the liberty to reveal the</p> <p>11 information here since that question is related to</p> <p>12 my business secret.</p> <p>13 Q Can you describe your business secret</p> <p>14 without revealing it?</p> <p>15 A Stocks.</p> <p>16 Q The investment was in stocks?</p> <p>17 MR. CHUFF: Objection to the</p> <p>18 form.</p> <p>19 A No. I invested in stocks.</p> <p>20 Q Did you invest Eastern Profit</p> <p>21 resources in stock?</p> <p>22 A Yes.</p> <p>23 Q Isn't that public information?</p> <p>24 MR. CHUFF: Objection. Form.</p> <p>25 A Yes. However, here I don't want to</p> <p style="text-align: right;">Page 55</p>	<p>1 HAN CHUNGUANG</p> <p>2 establish relevance.</p> <p>3 Q Do you know the answer to my</p> <p>4 question?</p> <p>5 A I don't understand to answer the</p> <p>6 question.</p> <p>7 Q You don't want to say whether you</p> <p>8 know the answer?</p> <p>9 A I just trying to tell you that I</p> <p>10 don't want to answer it. I don't want to answer</p> <p>11 any question related to this.</p> <p>12 Q Describe what a capitalization is for</p> <p>13 a business like Eastern Profit.</p> <p>14 MR. PODHASKIE: Objection.</p> <p>15 Vague.</p> <p>16 A It's difficult for me to say.</p> <p>17 Q Where was Eastern Profit formed?</p> <p>18 A In Hong Kong.</p> <p>19 Q Does Eastern Profit have a business</p> <p>20 address?</p> <p>21 A Yes.</p> <p>22 Q What is it?</p> <p>23 A Bank of China's building, 49th floor.</p> <p>24 THE INTERPRETER: Interpreter is</p> <p>25 translation, which may not be the</p> <p style="text-align: right;">Page 57</p>

15 (Pages 54 to 57)



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<p>1 HAN CHUNGUANG 2 official address. 3 Q Has that always been Eastern Profit's 4 business address? 5 MR. CHUFF: Objection. 6 Foundation. 7 A When you say that had this address 8 been the business address of Eastern Profit, what 9 do you mean by that? 10 Q I understood you testified that 11 Eastern Profit had a business location. Is that 12 true? 13 A Yes. 14 Q Where is Eastern Profit's business 15 location? 16 A You asking me the company address; 17 right? The company address was Bank of China 18 Building, 49th floor. 19 Q Was that always Eastern Profit's 20 address since you purchased it? 21 A Yes. 22 Q Have you been there? 23 A Yes, I did. 24 Q When was that? 25 A Wow. It was several years ago.</p> <p style="text-align: right;">Page 58</p>	<p>1 HAN CHUNGUANG 2 did not need anyone to select it for me. 3 Q Did you sign any written document to 4 make yourself director of Eastern Profit? 5 A Yes. 6 Q Did you become a director of Eastern 7 Profit at the same time you purchased it? 8 A Yes. 9 Q What was the business of Eastern 10 Profit when you purchased it? 11 A Investment. 12 Q Did that purchase change over time? 13 A No. No. It had not. 14 Q Was the amount that Eastern Profit 15 invested the amount that you used to purchase 16 Eastern Profit in the first instance? 17 Where did the fund come from that 18 Eastern Profit used to make an investment? 19 A For my family fund. 20 Q Is that the family fund you work for 21 today? 22 A Yes. 23 Q Who at the family fund did you work 24 with to get the funds transferred so that Eastern 25 Profit could make investments?</p> <p style="text-align: right;">Page 60</p>
<p>1 HAN CHUNGUANG 2 Q How many times have you been to 3 Eastern Profit's office? 4 A Several times. 5 Q When you purchased Eastern Profit, 6 did it have any other owners? 7 A No. I was the only owner at the 8 time. 9 Q Describe your role with Eastern 10 Profit other than that you owned it for a period 11 of time? 12 MR. PODHASKIE: Objection. 13 Form. 14 A Before I transferred the ownership to 15 Guo Mei, I was a director of the company. After I 16 had it transferred to Guo Mei, she was the 17 director. I became her agent. 18 Q Is it true that you chose yourself to 19 be the director of Eastern Profit? 20 A When you say I choose myself to be 21 director, I mean I don't really understand your 22 question, by the way. 23 Q Did someone select you to be a 24 director of Eastern Profit? 25 A I purchased it. I was the boss. I</p> <p style="text-align: right;">Page 59</p>	<p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection to form. 3 A This has nothing to do with this 4 case, and this question, it's very proven to my 5 privacy. I don't want to answer it. 6 Q To put it in a timeframe, you became 7 a director of Eastern Profit in 2014? 8 MR. CHUFF: Objection to form. 9 A That's correct. When I purchased it 10 in 2014. 11 Q What educational experience did you 12 have at that time to prepare you for the role of a 13 director of Eastern Profit? 14 MR. CHUFF: Objection to form. 15 A Is she asking me about my educational 16 background? 17 Q Yes, but specifically to give you the 18 preparation that you needed to be a director of 19 Eastern Profit. 20 A I went to two-year college. 21 Secondly, Mr. Guo has been teaching me a lot. 22 MS. WANG: That was at least 23 three years, college. 24 THE INTERPRETER: It's three 25 years in China. The interpreter</p> <p style="text-align: right;">Page 61</p>

16 (Pages 58 to 61)

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<p>1 HAN CHUNGUANG 2 would accept the correction. 3 A I formed a three year college. 4 Secondly, Mr. Guo has been teaching me a lot. 5 Thirdly, I love to read books. Have educated me a 6 lot. Fourthly, society was also a good teacher 7 that taught me a lot. 8 Q What educational institution gave you 9 the degree after the three years of college? 10 A It was Chinese school. 11 Q What was the name? 12 A This question is very specific. I 13 don't think I want to answer such a specific 14 question. 15 Q It is a very common question to be 16 asked where you received a degree from, so please 17 answer the question. 18 A For me this question very specific. 19 This is a very private -- no, I don't mean very 20 private. I just think this question has nothing 21 to do with this case. I don't feel that I should 22 answer this question. 23 Q Are you concerned about answering the 24 question because you did not receive a degree from 25 the Chinese school?</p> <p style="text-align: right;">Page 62</p>	<p>1 HAN CHUNGUANG 2 Q Was it the athletic school of Lunan? 3 A I'm not familiar with the name you 4 pronounced. Lunan? I'm not family with it, is 5 the way you read it. 6 Q Did you receive a degree in athletics 7 from your education? 8 A Yes. I went to an athletic school. 9 Q Is that where you received your 10 degree from? 11 A In terms of a degree, I always got 12 certificate from each level of school. I attended 13 an elementary, from junior high to high school, 14 and from technical secondary school. 15 Q The secondary school was the same 16 thing as the technical school; correct? 17 A I'm not sure. But in Chinese it is 18 called technical secondary school. 19 Q The degree you received from the 20 technical secondary school was in athletics; 21 correct? 22 A Yes. Yes. That's why. 23 Q Have you received any other degrees 24 after high school? 25 MR. CHUFF: Objection. Form.</p> <p style="text-align: right;">Page 64</p>
<p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection. 3 A I did. I went to the school. 4 THE INTERPRETER: Interpreter 5 would like to correct herself. 6 According to the dictionary, the 7 three year college actually was more 8 like technical secondary school. 9 Q Did you receive a degree from a 10 technical school? 11 A Yes. 12 Q What was the name of the technical 13 school? 14 MR. CHUFF: Objection. Form. 15 A It was a long time ago. I don't 16 remember. 17 Q How old are you? 18 A I'm 30 years old. 19 Q You can't remember the name of the 20 school that gave you a degree? 21 MR. CHUFF: Objection. 22 Argumentative. 23 A I don't remember. I don't usually 24 remember small things like this because I'm always 25 very business.</p> <p style="text-align: right;">Page 63</p>	<p>1 HAN CHUNGUANG 2 A I went to some institutions or 3 institution to receive training or trainings. 4 Q In what? 5 A I would say I learned it by myself. 6 For instance, about investment et cetera, et 7 cetera. 8 Q Did you go to a military or state 9 security school in China? 10 A No. 11 Q What about in Hong Kong? 12 A No. 13 Q I want to make sure I understand your 14 answer to my question about what educational 15 experience you had to prepare you to be a director 16 of Eastern Profit. You've described your formal 17 education. 18 What else prepared you to be a 19 director of Eastern Profit? 20 MR. CHUFF: Objection. Asked 21 and answered. 22 A Does she mean that only a person who 23 receives a formal education to be a director can 24 be a director in a company? Is that what she 25 means when she asks this question?</p> <p style="text-align: right;">Page 65</p>

17 (Pages 62 to 65)

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<p>1 HAN CHUNGUANG</p> <p>2 Q That is not the question.</p> <p>3 The question is what, besides the</p> <p>4 education you described, prepared you to be a</p> <p>5 director of Eastern Profit?</p> <p>6 A I purchased it and I became the</p> <p>7 director of the company.</p> <p>8 Q So nothing other than the education</p> <p>9 you described prepared you to be a director of</p> <p>10 Eastern Profit?</p> <p>11 MR. CHUFF: Objection. Asked</p> <p>12 and answered. Mischaracterizes the</p> <p>13 testimony.</p> <p>14 A Let me put it this way. My own</p> <p>15 experience, Mr. Guo's teaching, myself learning</p> <p>16 and what I have been learning from my family trust</p> <p>17 or family fund, all this prepared me for it and</p> <p>18 also prepared me for the future. It doesn't mean</p> <p>19 that I only learned things through a formal</p> <p>20 education.</p> <p>21 Q Did you review any written materials</p> <p>22 about Eastern Profit when you became its director?</p> <p>23 MR. CHUFF: Objection to form.</p> <p>24 A I don't remember. In terms of all</p> <p>25 the documents related to the company, they were</p> <p style="text-align: right;">Page 66</p>	<p>1 HAN CHUNGUANG</p> <p>2 Hong Kong.</p> <p>3 Q Regarding Eastern Profit; correct?</p> <p>4 A Yes.</p> <p>5 Q Were you living in Hong Kong at the</p> <p>6 time?</p> <p>7 A Yes. When I purchased Eastern</p> <p>8 Profit, I lived in Hong Kong.</p> <p>9 Q What education did Natasha have that</p> <p>10 allowed her to serve this role?</p> <p>11 MR. CHUFF: Objection. This is</p> <p>12 completely beyond the scope. I let</p> <p>13 this go long enough. He's not --</p> <p>14 MS. DONNELLI: Are you</p> <p>15 testifying for the witness?</p> <p>16 MR. CHUFF: I'm explaining why</p> <p>17 this line of questioning has to stop.</p> <p>18 MS. DONNELLI: Why don't you</p> <p>19 just object to it rather than coach</p> <p>20 him?</p> <p>21 MR. CHUFF: I want to explain my</p> <p>22 basis. I'm not coaching him because</p> <p>23 he's not going to answer it.</p> <p>24 This is not a case where he's</p> <p>25 being sued for managing Eastern</p> <p style="text-align: right;">Page 68</p>
<p>1 HAN CHUNGUANG</p> <p>2 handled by Natasha, whom I trusted very much.</p> <p>3 Q When Natasha was doing this role,</p> <p>4 where was she employed?</p> <p>5 MR. CHUFF: Objection. Asked</p> <p>6 and answered.</p> <p>7 A I don't know whom she was working for</p> <p>8 at the time.</p> <p>9 Q Was she employed by Eastern Profit?</p> <p>10 A She was an agent authorized by me.</p> <p>11 Q An agent authorized for Eastern</p> <p>12 Profit?</p> <p>13 A No. She was the agent authorized by</p> <p>14 me. At the time I was the boss of Eastern Profit,</p> <p>15 I authorized Natasha to handle a lot of stuff in</p> <p>16 Hong Kong for me.</p> <p>17 Q Was she an employee of Eastern</p> <p>18 Profit?</p> <p>19 MR. CHUFF: Objection. Asked</p> <p>20 and answered.</p> <p>21 A An employee? You can say that.</p> <p>22 Q How long was she employed by Eastern</p> <p>23 Profit?</p> <p>24 A I think about two years. I'm only</p> <p>25 talking about she was handling matters for me in</p> <p style="text-align: right;">Page 67</p>	<p>1 HAN CHUNGUANG</p> <p>2 Profit a certain way. This is about</p> <p>3 a contract between an entity and</p> <p>4 another entity.</p> <p>5 MS. DONNELLI: Why don't you</p> <p>6 just say I'm going to instruct him</p> <p>7 not to answer. It will save a lot of</p> <p>8 time, and it won't coach the witness.</p> <p>9 MR. CHUFF: He's not answering.</p> <p>10 Q Is Natasha's name spelled Q-U, first</p> <p>11 name, last name G-U. Last name is Q-U. First</p> <p>12 name G-U-O-J-I-A-O?</p> <p>13 A I don't know this name. I only know</p> <p>14 the person I knew whose name was Natasha.</p> <p>15 Q Have you personally seen the written</p> <p>16 records of Eastern Profit's business dealings?</p> <p>17 MR. CHUFF: Objection. Vague.</p> <p>18 A I think so, yes.</p> <p>19 Q When was that?</p> <p>20 MR. CHUFF: Objection. Vague.</p> <p>21 A I think several years ago.</p> <p>22 Q What was the purpose of your review?</p> <p>23 A When I purchase it, I of course</p> <p>24 looked into the document. I have to know what I</p> <p>25 was purchasing. Once I took over the company, I</p> <p style="text-align: right;">Page 69</p>

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<p>1 HAN CHUNGUANG 2 gave them to Natasha. I also gave her the CO and 3 stuff so that she could handle stuff for me in 4 Hong Kong. 5 Q When you were serving as a director 6 of Eastern Profit, were there any other directors 7 besides yourself? 8 A When I was the director of the 9 company, no one else was. 10 Q When you were director of Eastern 11 Profit, was it successful? 12 A Was this successful company? How are 13 you going to define whether a company is 14 successful or not? Please teach me. 15 Q Were you pleased with the performance 16 of Eastern Profit when you were the director of 17 it? 18 MR. CHUFF: Objection. 19 Relevance. 20 A It was okay. 21 Q Did Eastern Profit have any debts 22 when you were a director? 23 MR. CHUFF: Objection. The 24 court already ruled on this. There's 25 to be no questioning about the</p> <p style="text-align: right;">Page 70</p>	<p>1 HAN CHUNGUANG 2 A What do you mean by that? 3 Q You've testified that Eastern 4 Profit's assets were frozen. How did you come to 5 know that? 6 A Natasha told me. 7 Q So the freezing, excuse me, of the 8 assets took place in the two years that Natasha 9 did services for Eastern Profit? 10 A I don't remember. It was a long time 11 ago. 12 Q After the assets of Eastern Profit 13 were frozen, was it able to conduct any business? 14 A Natasha could. Just one second. 15 THE INTERPRETER: Can you repeat 16 your question? I wanted to have your 17 question read back. I want to know 18 your question. 19 (The requested portion of the 20 record was read back by the 21 reporter.) 22 A After the asset was frozen, the 23 company didn't do any business. 24 Q What, as a director of Eastern 25 Profit, did you do to challenge the order freezing</p> <p style="text-align: right;">Page 72</p>
<p>1 HAN CHUNGUANG 2 independent financial identity of 3 Eastern Profit. That's Docket 189, 4 page 4. There's only one debt that's 5 relevant to this case. 6 Q Who took over from Natasha after she 7 left? 8 A No one else by the time the company 9 was frozen. 10 Q What caused the company to have its 11 assets frozen? 12 A Actually, I wanted to know the answer 13 of your question. I want to know why the police 14 took control of my company, and my assets was 15 frozen, and the police took my people away. 16 I really want to know the answer to 17 your question. 18 Q Was there anything you did as a 19 director of Eastern Profit that caused that to 20 happen? 21 MR. CHUFF: Objection. 22 A No. I have not done anything illegal 23 as a director. 24 Q How did you come to know that Eastern 25 Profit's assets were frozen?</p> <p style="text-align: right;">Page 71</p>	<p>1 HAN CHUNGUANG 2 Eastern Profit's assets? 3 MR. CHUFF: Objection. Form. 4 THE INTERPRETER: Interpreter 5 needs clarification from the witness. 6 A At the end of 2017 Yvette told me 7 there was this company that was very good at the 8 investigation, and the company was able to find 9 out the government's corruption in China. This 10 would help me to have my assets un-frozen. 11 When Yvette told me and say to me it 12 was a great idea, I mention it to Guo Mei, and 13 then I authorized Yvette to handle this matter for 14 me. 15 Q Were you still a director of Eastern 16 Profit when that took place? 17 A Guo Mei was the director at the time. 18 Why I was the agent. 19 Q Was the freezing of the assets of 20 Eastern Profit while you were a director of 21 Eastern Profit? 22 A When the assets was frozen, no, I was 23 not. 24 Q So the freezing of the assets took 25 place after you were no longer director of Eastern</p> <p style="text-align: right;">Page 73</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Profit?</p> <p>3 A That's correct. I was an agent.</p> <p>4 Q How long had it been since you were a</p> <p>5 director of Eastern Profit when the freezing of</p> <p>6 the assets happened?</p> <p>7 MR. CHUFF: Objection to form.</p> <p>8 A How long? Again, I don't remember</p> <p>9 the specific, but I think about two years.</p> <p>10 Q So two years passed after you left</p> <p>11 being a director of Eastern Profit and when the</p> <p>12 assets of the company were frozen?</p> <p>13 MR. CHUFF: Objection to form.</p> <p>14 A Can you repeat your question?</p> <p>15 Q How much time passed after you</p> <p>16 stopped being a director of Eastern Profit and</p> <p>17 when the assets were frozen?</p> <p>18 A I don't remember.</p> <p>19 Q Who ordered the freezing of Eastern</p> <p>20 Profit's assets?</p> <p>21 MR. PODHASKIE: Objection.</p> <p>22 Form.</p> <p>23 A I didn't know who ordered it. I</p> <p>24 really wanted to know the answer to your question.</p> <p>25 I think it was an order from the communist party</p> <p style="text-align: right;">Page 74</p>	<p>1 HAN CHUNGUANG</p> <p>2 company to find out the Chinese government's</p> <p>3 corruptions. Number 2, to help me unfreeze my</p> <p>4 assets. Number 3 to have my company back to</p> <p>5 normal.</p> <p>6 Q Did anyone replace Natasha after she</p> <p>7 stopped doing work for Eastern Profit?</p> <p>8 MR. CHUFF: Objection. Asked</p> <p>9 and answered. Relevance.</p> <p>10 A No.</p> <p>11 MS. DONNELLI: We'll make this</p> <p>12 the last couple of questions before</p> <p>13 our break.</p> <p>14 Q Prior to the time that Eastern</p> <p>15 Profit's assets were frozen, did Eastern Profit</p> <p>16 operate a private equity fund?</p> <p>17 MR. CHUFF: Objection. This</p> <p>18 goes to the independent financial</p> <p>19 control and identity of Eastern</p> <p>20 Profit, and the court has already</p> <p>21 ruled this is not a permissible scope</p> <p>22 of questioning.</p> <p>23 MS. DONNELLI: Are you</p> <p>24 instructing the witness not to</p> <p>25 answer?</p> <p style="text-align: right;">Page 76</p>
<p>1 HAN CHUNGUANG</p> <p>2 in China.</p> <p>3 Q You don't know why the assets were</p> <p>4 frozen or what reason was given?</p> <p>5 MR. CHUFF: Objection.</p> <p>6 Foundation.</p> <p>7 A No, I don't.</p> <p>8 Q You mentioned that transaction was</p> <p>9 done by Eastern Profit with an investigation</p> <p>10 company.</p> <p>11 Do you remember your testimony?</p> <p>12 THE INTERPRETER: Can I have the</p> <p>13 question read back?</p> <p>14 (The requested portion of the</p> <p>15 record was read back by the</p> <p>16 reporter.)</p> <p>17 MR. PODHASKIE: Objection.</p> <p>18 Form.</p> <p>19 A Yes.</p> <p>20 Q Was the purpose of the investigation</p> <p>21 to allow Eastern Profit to have its assets</p> <p>22 unfrozen?</p> <p>23 A That was a part of it.</p> <p>24 Q What was the other part?</p> <p>25 A Number 1, to hire this investigation</p> <p style="text-align: right;">Page 75</p>	<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: Yes.</p> <p>3 Q When you were a director of Eastern</p> <p>4 Profit, did it have any clients?</p> <p>5 MR. CHUFF: Same objection. It</p> <p>6 goes to independent financial</p> <p>7 identity, and the court has already</p> <p>8 ruled on this.</p> <p>9 Q Which family trust did Eastern Profit</p> <p>10 give the money with which it was making</p> <p>11 investments?</p> <p>12 MR. CHUFF: Same objection.</p> <p>13 Q Did you receive compensation as a</p> <p>14 director of Eastern Profit?</p> <p>15 A When I was the director of the</p> <p>16 company?</p> <p>17 Q Yes.</p> <p>18 MR. PODHASKIE: Objection.</p> <p>19 Makes no sense. He's the owner, but</p> <p>20 I will let him answer.</p> <p>21 MS. DONNELLI: Please don't</p> <p>22 testify for the witness, counsel.</p> <p>23 A I think so.</p> <p>24 Q What was it?</p> <p>25 A Are you talking about the revenue in</p> <p style="text-align: right;">Page 77</p>

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<p>1 HAN CHUNGUANG 2 my company? 3 Q Any kind of compensation. 4 MR. CHUFF: Objection. 5 Misleading. 6 A Since I don't feel that this question 7 has anything to do with this case, this is about 8 the finance of the company. I'm not going to 9 answer it. 10 Q Was the reason that you stopped being 11 a director of Eastern Profit because you weren't 12 being paid for your work? 13 MR. CHUFF: Objection. Vague. 14 Confusing and misleading. 15 A Again, this has nothing do with this 16 case. I'm not going to answer it. 17 Q Did you receive any compensation or 18 payments as an agent of Eastern Profit? 19 A I believe so. I believe when the 20 company's asset is unfreeze one day, I will 21 receive some compensation, because this is normal 22 business model where I believe I will receive some 23 compensation one day. 24 Q Before Eastern Profit's assets were 25 frozen, did you receive any compensation?</p> <p style="text-align: right;">Page 78</p>	<p>1 HAN CHUNGUANG 2 ask her for opinion. Just part of a business 3 routine. 4 Q Have you ever been a principal of 5 Eastern Profit? 6 MR. CHUFF: Objection. Asked 7 and answered. 8 A When are you talking about? 9 Q Any time since 2014 to the present. 10 MR. CHUFF: Same objection. 11 A I am always acting on behalf of 12 Eastern Profit. 13 Q Has he ever held the title principal 14 of Eastern Profit? Have you? 15 MR. CHUFF: Same objection. 16 A I don't really understand your 17 question. All I can say to you is that before I 18 transfer it, my company to her, I was the 19 director. After I transfer my company to her, I 20 was the agent. That is it. 21 Q Do you receive compensation from 22 Golden Spring, New York? 23 A No. 24 Q Have you ever? 25 A No.</p> <p style="text-align: right;">Page 80</p>
<p>1 HAN CHUNGUANG 2 MR. CHUFF: As an agent or a 3 director? 4 Q Either in your capacity as an agent 5 or a director? 6 MR. CHUFF: Objection. 7 Compound. And to the extent it's 8 asking for compensation as an owner 9 is misleading. 10 A When you say about compensation, can 11 you be more specific, because I really don't 12 understand the word compensation. 13 Q It means wages, salary, money for any 14 reason. 15 A When I was a director, when I was a 16 boss, of course I received some money. Because I 17 was making money or cost, I reaped the benefits. 18 Q At Eastern Profit is there a 19 difference between a principal and a director 20 role? 21 A Between principal and the director? 22 Q Yes. 23 A Right now Guo Mei is the director of 24 the company while I am her agent. When I'm 25 handling her stuff for her out of respect, I will</p> <p style="text-align: right;">Page 79</p>	<p>1 HAN CHUNGUANG 2 MS. DONNELLI: We'll take a 3 break. 4 (At this time, a brief recess 5 was taken.) 6 (Time noted: 12:54 p.m.) 7 (After a luncheon recess was 8 taken, the following was had:) 9 (Time noted: 1:48 p.m.) 10 11 A F T E R N O O N S E S S I O N 12 CONTINUED EXAMINATION 13 BY MS. DONNELLI: 14 Q We're here after a break. 15 Would you say that -- 16 MR. CHUFF: Could I just make 17 one thing on the record. 18 So we've been going for two and 19 a half hours now, and virtually none 20 of the questioning has been within 21 the scope of what the court ordered 22 Mr. Han to appear for. 23 If it continues, we reserve our 24 rights to seek fees from the court 25 after this deposition.</p> <p style="text-align: right;">Page 81</p>

21 (Pages 78 to 81)

Han Chunguang  
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<p>1 HAN CHUNGUANG</p> <p>2 Q Would you say, Mr. Han, that you were</p> <p>3 very careful in your role as a director of Eastern</p> <p>4 Profit?</p> <p>5 A What do you mean by that?</p> <p>6 Q You wanted everything done right as a</p> <p>7 director of Eastern Profit; correct?</p> <p>8 A Yes.</p> <p>9 Q You wouldn't have signed something</p> <p>10 for Eastern Profit unless you were a director of</p> <p>11 it; right?</p> <p>12 MR. CHUFF: Objection.</p> <p>13 Misleading. Mischaracterizes</p> <p>14 testimony.</p> <p>15 A I don't understand your question.</p> <p>16 What do you mean by that?</p> <p>17 Q You wouldn't have signed something</p> <p>18 for Eastern Profit unless you were a director of</p> <p>19 Eastern Profit; right?</p> <p>20 MR. CHUFF: Same objection.</p> <p>21 A When I was an agent for a company, I</p> <p>22 had also signed some documents.</p> <p>23 Q Is one of Eastern Profit's</p> <p>24 investments cars?</p> <p>25 MR. CHUFF: Objection. This is</p> <p>Page 82</p>	<p>1 HAN CHUNGUANG</p> <p>2 A I don't think Eastern Profit had ever</p> <p>3 invested in car. But the company owned cars.</p> <p>4 Q How many cars did the company own</p> <p>5 when Mr. Han was a director?</p> <p>6 MR. CHUFF: Objection. This is</p> <p>7 all irrelevant.</p> <p>8 A Several.</p> <p>9 Q Have you ever attended a director's</p> <p>10 meeting for Eastern Profit?</p> <p>11 MR. CHUFF: Objection. This</p> <p>12 goes into the financial independence</p> <p>13 of Eastern Profit, and the court</p> <p>14 already ruled on this. You're not</p> <p>15 permitted to ask questions about it.</p> <p>16 Q You testified that you put a</p> <p>17 signature on documents as an agent for Eastern</p> <p>18 Profit. In connection with that, did you ever</p> <p>19 attend any meeting giving you authority to do</p> <p>20 that?</p> <p>21 A What kind of meeting?</p> <p>22 Q Any kind of meeting in which,</p> <p>23 Mr. Han, you were given authority to make your</p> <p>24 signature on behalf of Eastern Profit?</p> <p>25 MR. CHUFF: Objection. Asked</p> <p>Page 84</p>
<p>1 HAN CHUNGUANG</p> <p>2 beyond the scope of the court order</p> <p>3 Mr. Han is here for.</p> <p>4 MS. DONNELLI: Are you</p> <p>5 instructing the witness not to answer</p> <p>6 that? It comes directly from</p> <p>7 Miss Wang's testimony for Eastern</p> <p>8 Profit within the last couple of</p> <p>9 weeks.</p> <p>10 MR. CHUFF: It's beyond the</p> <p>11 scope of what the court ordered for</p> <p>12 Mr. Han.</p> <p>13 MS. DONNELLI: So are you</p> <p>14 instructing the witness not to</p> <p>15 answer?</p> <p>16 MR. CHUFF: You can ask your</p> <p>17 question.</p> <p>18 MS. DONNELLI: Okay. Can you</p> <p>19 read it back? Thank you.</p> <p>20 (The requested portion of the</p> <p>21 record was read back by the</p> <p>22 reporter.)</p> <p>23 A What cars?</p> <p>24 Q Any kind of investment in cars,</p> <p>25 vehicles.</p> <p>Page 83</p>	<p>1 HAN CHUNGUANG</p> <p>2 and answered.</p> <p>3 A In New York I authorized Yvette to</p> <p>4 handle the affairs for me here.</p> <p>5 Q What kind of reporting did Yvette do</p> <p>6 to you after you authorized her?</p> <p>7 A Yvette --</p> <p>8 MR. CHUFF: Objection. Form.</p> <p>9 A Not much reporting from her because I</p> <p>10 trust her very much in the same position against</p> <p>11 communist party in China.</p> <p>12 I have full confidence in her to</p> <p>13 handle the affair for me. There's not much</p> <p>14 reporting required from her. Of course</p> <p>15 occasionally we talked a little bit about it.</p> <p>16 Q Did you authorize Yvette to handle</p> <p>17 all the affairs of eastern profit or just the one</p> <p>18 involving the investigative project?</p> <p>19 A Everything.</p> <p>20 Q For the everything, did you ever</p> <p>21 authorize Yvette to approve an invoice for Eastern</p> <p>22 Profit?</p> <p>23 MR. CHUFF: Objection. Assuming</p> <p>24 facts.</p> <p>25 A When I'm talking about my</p> <p>Page 85</p>



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<p>1 HAN CHUNGUANG 2 authorization to Yvette, I'm actually talking 3 about everything related to the hired 4 investigation company. 5 Q I thought your testimony was that you 6 authorized a Yvette to handle all of the affairs 7 of Eastern Profit? 8 A No. Thing related to this matter. 9 Q What do you mean by "this matter"? 10 A To hire this investigation company 11 and also to handle everything related to the hired 12 investigation company. 13 Q Was there anything else that you 14 authorized Yvette to handle for Eastern Profit? 15 A Only for this investigation and 16 everything related to it. 17 Q Did you get permission from Guo Mei 18 to authorize Yvette? 19 MR. CHUFF: Objection. Asked 20 and answered. 21 A I did not have to have permission for 22 Guo Mei. However, I did report it to her. I did 23 speak to her about it. 24 Q Were you the person who chose Yvette 25 for her role versus someone else?</p> <p style="text-align: right;">Page 86</p>	<p>1 HAN CHUNGUANG 2 Q Was that because the assets of 3 Eastern Profit were frozen? 4 A Yes. 5 Q What volume of assets of Eastern 6 Profit were frozen? 7 MR. CHUFF: Objection. Vague as 8 to what volume means. 9 A Are you asking me to give you a 10 number or what? 11 Q More of a category. Was it all of 12 Eastern Profit's assets that were frozen, a 13 portion of them, something less than all? 14 A My company account or accounts was -- 15 all were freezed. 16 THE INTERPRETER: Again in 17 Chinese there's no singular or 18 plural. 19 Q In total or just in part? 20 A All. 21 Q You testified that the reason that 22 Eastern Profit got involved with the investigative 23 company was to unfreeze Eastern Profit's assets. 24 Do you remember that testimony? 25 MR. PODHASKIE: Objection.</p> <p style="text-align: right;">Page 88</p>
<p>1 HAN CHUNGUANG 2 A Yes. 3 Q In connection with Yvette's work, did 4 she have control over Eastern Profit's bank 5 accounts? 6 MR. CHUFF: Objection. It's 7 beyond the scope of what the court 8 allowed Mr. Han to testify about. 9 A I don't want to answer this question. 10 Q Are you instructing the witness not 11 to answer the question? It relates specifically 12 to the work that Yvette did in relation to Eastern 13 Profit and the investigative project? 14 MR. CHUFF: Can you explain that 15 to me? I don't see how it does. 16 MS. DONNELLI: In connection 17 with that work I've asked did Yvette 18 have control over Eastern Profit's 19 bank accounts in connection with that 20 work. 21 MR. CHUFF: You didn't use that 22 last phrase. 23 Q In relation to the investigative 24 project. 25 A She couldn't.</p> <p style="text-align: right;">Page 87</p>	<p>1 HAN CHUNGUANG 2 Mischaracterizes the testimony. 3 A Yes, I did. 4 Q Was that project successful to 5 unfreeze Eastern Profit's assets? 6 A Up to now, no. It's not successful. 7 Q Eastern Profit's assets remain frozen 8 today; is that true? 9 A Yes. 10 Q Do you know how long that the 11 investigative company was allowed to do its work? 12 A When Yvette talked to me at the time, 13 she said it would only take several months and we 14 will see the result of it. 15 Q When Eastern Profit didn't see the 16 result of it, did it hire any other company to do 17 the investigation? 18 MR. CHUFF: Objection. Are you 19 asking of the same targets, that's 20 strategic vision? 21 MS. DONNELLI: Counsel, please 22 don't testify for the witness. You 23 made an objection to form. Let us go 24 on. 25 MR. CHUFF: I'm just trying to</p> <p style="text-align: right;">Page 89</p>

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<p>1 HAN CHUNGUANG</p> <p>2 help you.</p> <p>3 MS. DONNELLI: I don't think</p> <p>4 you're trying to help.</p> <p>5 MR. CHUFF: I am because the</p> <p>6 court said you're allowed to ask</p> <p>7 about the subjects that were part of</p> <p>8 the Strategic Vision contract and not</p> <p>9 other subjects.</p> <p>10 So if you want to ask about</p> <p>11 those subjects, it's permissible.</p> <p>12 Otherwise it's not.</p> <p>13 Q Regarding any of the work that</p> <p>14 Eastern Profit hired the investigative company to</p> <p>15 do, once that unfreezing of assets didn't happen,</p> <p>16 did Eastern Profit hire any other company for the</p> <p>17 purpose of unfreezing the assets through</p> <p>18 investigative work?</p> <p>19 A This has nothing to do as it is.</p> <p>20 Q Please answer the question.</p> <p>21 A I don't want to answer.</p> <p>22 MR. CHUFF: You can answer, if</p> <p>23 you know.</p> <p>24 A Are you asking if Eastern Profit</p> <p>25 hires another investigative company to do the same</p> <p>Page 90</p>	<p>1 HAN CHUNGUANG</p> <p>2 to enter into an arrangement with the</p> <p>3 investigative company?</p> <p>4 MR. PODHASKIE: Objection.</p> <p>5 Beyond the scope of the court's</p> <p>6 order.</p> <p>7 A No. I give the full authorization to</p> <p>8 Yvette. It was not necessary to require a</p> <p>9 resolution.</p> <p>10 Okay. Let me tell you why I give</p> <p>11 Yvette full authorization over this matter. The</p> <p>12 reason was that Miss Guo was against communist</p> <p>13 party in China. I followed Mr. Guo's example. I</p> <p>14 was also strongly against the communist party in</p> <p>15 China wants that was why the Chinese government</p> <p>16 freeze my asset.</p> <p>17 And when Yvette told me about this</p> <p>18 wonderful company that would be able to expose the</p> <p>19 Chinese government's corruption and it will give</p> <p>20 me an opportunity to get my asset back. She also</p> <p>21 assured me that in U.S., this could be done</p> <p>22 legally, and I thought that this was wonderful</p> <p>23 idea. I get gave her my full authorization to</p> <p>24 handle this matters.</p> <p>25 Like Miss Guo, we were all against</p> <p>Page 92</p>
<p>1 HAN CHUNGUANG</p> <p>2 job.</p> <p>3 Q Yes. After the first investigative</p> <p>4 company was no longer doing the project.</p> <p>5 A I'm not sure.</p> <p>6 Q Your testimony is that you're not</p> <p>7 aware of any other company that came in after to</p> <p>8 do the same work; true?</p> <p>9 A Yes.</p> <p>10 Q When Eastern Profit was entering into</p> <p>11 the project with the investigation company, did</p> <p>12 Eastern Profit pass a resolution to allow that</p> <p>13 transaction?</p> <p>14 A I authorized Yvette to take care of</p> <p>15 this business, and Yvette had my full</p> <p>16 authorization to take care of things like this.</p> <p>17 Q Was a resolution signed by you</p> <p>18 allowing Yvette to do this?</p> <p>19 A I don't really understand what you</p> <p>20 mean by resolution.</p> <p>21 Q Do you know what the term resolution</p> <p>22 means in the context of a private company?</p> <p>23 A Yes, I do.</p> <p>24 Q Did Eastern Profit's company bylaws</p> <p>25 require a resolution before Yvette was permitted</p> <p>Page 91</p>	<p>1 HAN CHUNGUANG</p> <p>2 the communist parties in China. I gave her my</p> <p>3 full authorization to take charge of this matter.</p> <p>4 Q What is located at the Tai Yau</p> <p>5 building located at 181 Johnston Road, Wanchai,</p> <p>6 W-A-N-C-H-A-I, Hong Kong, if you know?</p> <p>7 MR. CHUFF: Objection. Beyond</p> <p>8 the scope of the court's order.</p> <p>9 A This has nothing to do with this</p> <p>10 case. I am not at liberty to answer this</p> <p>11 question.</p> <p>12 Q How do you know that the Chinese</p> <p>13 communist party was involved in the freezing of</p> <p>14 Eastern Profit's assets?</p> <p>15 A Can you repeat your question?</p> <p>16 (Interpreter complying)</p> <p>17 A Mr. Guo was in stanch option to</p> <p>18 Chinese communist party. I followed his example,</p> <p>19 and as a result of my position, my family was</p> <p>20 persecuted by the Chinese communist party, and</p> <p>21 then my accounts in Hong Kong were freezed, and my</p> <p>22 workers were taken away by the police.</p> <p>23 Who else -- did they have such kind</p> <p>24 of power to take away my people without leaving a</p> <p>25 trace. It was only the communist party in China.</p> <p>Page 93</p>

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<p>1 HAN CHUNGUANG 2 Q You say that your workers were taken 3 away. Did they work for Eastern Profit? 4 MR. PODHASKIE: Objection. 5 Beyond the scope. 6 A Natasha. Natasha was taken away. 7 Q Is Natasha the workers, plural, that 8 you just described? 9 THE INTERPRETER: The 10 interpreter note the plurals should 11 be the mistake of interpreter, 12 because interpreter would not know 13 how many workers because Chinese 14 doesn't have singular or plural. 15 A Yes, Natasha. I was talking about 16 Natasha, my agent back then. 17 Q Did the interpreter use the name 18 Q-U-G-A-I-O -- G-U-O-J-I-A-O in relation to that 19 last answer? 20 A Interpreter only repeated what the 21 witness said. Now unfortunately interpreter has 22 no memory of what my reputation is. 23 Q Mr. Han, what did you do to qualify 24 as a dissident in the eyes of the Chinese 25 communist party?</p> <p style="text-align: right;">Page 94</p>	<p>1 HAN CHUNGUANG 2 testimony. 3 MR. CHUFF: This court has 4 already ruled that you can't ask 5 those questions. Is not tied to any 6 claim or defense in this action. 7 MS. DONNELLI: See the problem 8 is that the time the court entered 9 that order, the representation had 10 been made by your side of things that 11 Mr. Han didn't have knowledge. There 12 was no reason to have him as a 13 witness. He didn't have anything to 14 say. 15 We now know based on Miss Wang's 16 testimony a couple of weeks ago that 17 Mr. Han does have information and he, 18 in fact, has been describing that 19 information today. 20 MR. CHUFF: Why the assets got 21 seized has nothing to with the 22 contract and whether the contract was 23 performed, or whether someone lied 24 about whether Guo was a dissident. 25 It's irrelevant and it's beyond</p> <p style="text-align: right;">Page 96</p>
<p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection. It's way 3 beyond the scope and the Court has 4 already said you can't ask about 5 personal history for coming to the 6 United States. 7 MS. DONNELLI: Right. I'm 8 asking for background to understand 9 the causation for why Eastern Profit 10 entered into the investigative 11 project. 12 The witness has said it's 13 because he's gotten on the wrong side 14 of the Chinese communist party. And 15 I'm asking him what did he do to get 16 on the wrong side of the Chinese 17 communist party? 18 MR. CHUFF: It's not relevant. 19 MS. DONNELLI: I'm not asking 20 for truth of what he did, but what 21 did he do that led the communist 22 party to take this action against 23 Eastern Profit that led to the 24 investigative project. That's 25 straight from this witness'</p> <p style="text-align: right;">Page 95</p>	<p>1 HAN CHUNGUANG 2 the scope of what the court allowed 3 this witness to testify to. 4 MS. DONNELLI: This witness has 5 testified that the actions by the 6 Chinese communist party directly led 7 to Eastern Profit getting involved in 8 the investigation project I think is 9 how this witness has described it. 10 I'm asking what does this 11 witness do on behalf of his company 12 that he is owning and taking -- being 13 the face of that led to the need to 14 have this investigative project. 15 I think it's absolutely 16 relevant. I don't think your order 17 says it's not. 18 MR. CHUFF: The order says it 19 has to be relevant to a claim or 20 defense. So tell me what element of 21 what claim or defense this is 22 relevant to. 23 MS. DONNELLI: This is the event 24 leading up to the research agreement, 25 the investigative project.</p> <p style="text-align: right;">Page 97</p>

25 (Pages 94 to 97)

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<p>1 HAN CHUNGUANG 2 MR. CHUFF: What element of what 3 defense or claim does this relate to. 4 MS. DONNELLI: There are fraud 5 claims. 6 MR. CHUFF: I know that's what 7 you guys keep saying. But explain it 8 to me because I don't understand it, 9 and the court hasn't understood it. 10 THE INTERPRETER: It's getting 11 real long. 12 MS. DONNELLI: I'm sorry. I've 13 gotten a little lost. 14 You made an objection. I 15 responded. Are you instructing the 16 witness not to answer? 17 MR. CHUFF: Can you just repeat 18 the question for me one more time? 19 (The requested portion of the 20 record was read back by the 21 reporter.) 22 MR. CHUFF: The answer to 23 counsel's question is yes. 24 MS. DONNELLI: So the witness is 25 being instructed not to answer that</p> <p style="text-align: right;">Page 98</p>	<p>1 HAN CHUNGUANG 2 A I don't know the specific, but I 3 heard about this person before. 4 Q From. 5 MR. CHUFF: Note my objection. 6 Asked and answered. 7 A For Mr. Guo. Mr. Guo mentioned him 8 before. 9 Q In relation to Mr. Guo wanting to 10 find out information about this person. 11 A No. I didn't know why Mr. Guo 12 mentioned about this person. 13 Q This name, are you familiar with Sun, 14 S-U-N, the first name or the last name, and then 15 the first name is Lijun, L-I-J-U-N? 16 A Again, I heard those people before. 17 Q From Mr. Guo? 18 A Yes. 19 Q Did you understand that that 20 individual was one of the subjects that the 21 investigative company was going to research? 22 A Again, I don't know any specifics 23 about the project. 24 Q When you authorized Yvette to get 25 involved with the investigation project, did you</p> <p style="text-align: right;">Page 100</p>
<p>1 HAN CHUNGUANG 2 question? 3 MR. CHUFF: Because it's beyond 4 the scope of what the court allowed 5 him to testify to. 6 Q Are you familiar with the name Meng 7 Jianzhu. Last name is M-E-N-G. First name is 8 J-I-A-N-Z-H-U. 9 A I have heard this person before. 10 Q Who do you know the person to be? 11 A When I was with Mr. Guo and we were 12 against Chinese communist party, I heard about 13 this person. I think this person was a Chinese 14 official. 15 Q Was this person one of the subjects 16 that Eastern Profit asked the investigative 17 company to research? 18 MR. CHUFF: Objection. 19 Foundation. 20 A As far as the specifics, we related 21 it to the investigation project. I don't have a 22 clear idea. I authorized Yvette to take charge of 23 it. 24 Q So you don't know the answer to that 25 question?</p> <p style="text-align: right;">Page 99</p>	<p>1 HAN CHUNGUANG 2 give Yvette any names or subjects that should be 3 researched? 4 A No. 5 Q Why did you resign from being a 6 director of Eastern Profit? 7 MR. CHUFF: Objection. Assumes 8 facts. Mischaracterizes the 9 testimony. 10 A Does this question have anything to 11 do with this case? If not, I'm not going to 12 answer the question. 13 Q Yes, it does. 14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it 18 not, also a resignation by you as director of 19 Eastern Profit? 20 A Yes. But I transferred the company 21 to Guo Mei. However, she still authorized me to 22 handle the affairs for the company. 23 Q Did you resign from Eastern Profit as 24 a director? 25 A Yes.</p> <p style="text-align: right;">Page 101</p>

26 (Pages 98 to 101)

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November 11, 2019

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<p>1 HAN CHUNGUANG</p> <p>2 Q When did you resign as a director?</p> <p>3 A On June 27, 2017 the company was</p> <p>4 transferred to Guo Mei, and Guo Mei asked me to</p> <p>5 continue to handle the company's affairs as an</p> <p>6 agent for her.</p> <p>7 MS. DONNELLI: Can you read the</p> <p>8 question, because the witness did not</p> <p>9 accept it.</p> <p>10 (The requested portion of the</p> <p>11 record was read back by the</p> <p>12 reporter.)</p> <p>13 A June 27, 2017.</p> <p>14 Q Why did you resign as a director of</p> <p>15 Eastern Profit?</p> <p>16 A This was one of my business'</p> <p>17 strategies which has nothing to do with this case.</p> <p>18 I'm not going to answer it.</p> <p>19 MS. DONNELLI: We'll need to ask</p> <p>20 the witness to answer the question.</p> <p>21 MR. CHUFF: Objection.</p> <p>22 Argumentative. Asked and answered.</p> <p>23 A I don't want to answer this question,</p> <p>24 and I insist that I not answer this question.</p> <p>25 Q Do you have the answer to the</p> <p>Page 102</p>	<p>1 HAN CHUNGUANG</p> <p>2 her. All this was not contradictory to each</p> <p>3 other.</p> <p>4 Q What do you mean by contradictory to</p> <p>5 each other?</p> <p>6 MR. CHUFF: Objection.</p> <p>7 A She asked me to be her agent, to take</p> <p>8 care of the affairs for her, and we were good</p> <p>9 friends. And I say okay. Fine. I will do so.</p> <p>10 I became an agent of the company.</p> <p>11 That was it.</p> <p>12 Q So Guo Mei asked you to resign from</p> <p>13 your directorship of Eastern Profit?</p> <p>14 MR. CHUFF: Objection. Assumes</p> <p>15 facts. Mischaracterizes testimony.</p> <p>16 A No.</p> <p>17 Q How did you come to know that Guo Mei</p> <p>18 had a plan that required you to resign as director</p> <p>19 from Eastern Profit?</p> <p>20 MR. CHUFF: Objection. Assumes</p> <p>21 facts. Mischaracterizes the</p> <p>22 testimony. Beyond the scope of what</p> <p>23 the court ordered him to testify to.</p> <p>24 A She told me she wanted to purchase my</p> <p>25 company to get into movie business. Then it's</p> <p>Page 104</p>
<p>1 HAN CHUNGUANG</p> <p>2 question in your mind?</p> <p>3 A What answer?</p> <p>4 Q If the answer to the question is you</p> <p>5 don't know why you resigned from the company,</p> <p>6 that's one thing. But if the witness has the</p> <p>7 answer in his mind, he needs to give it in</p> <p>8 response to the question.</p> <p>9 MR. CHUFF: Objection. I</p> <p>10 disagree. It's clearly beyond the</p> <p>11 scope of what the court ordered.</p> <p>12 A I am not going to answer this</p> <p>13 question.</p> <p>14 Q Explain why you resigned as director</p> <p>15 of Eastern Profit that remained as you are</p> <p>16 testifying in a role allowing you to be involved</p> <p>17 with Eastern Profit?</p> <p>18 MR. CHUFF: Objection. Asked</p> <p>19 and answered.</p> <p>20 A This was a business strategy of mine.</p> <p>21 And when I transferred the company to Guo Mei, Guo</p> <p>22 Mei had some intention to how to use this company.</p> <p>23 She had her idea what she was going</p> <p>24 to do about it. And then she asked me to be an</p> <p>25 agent for this company to handle the affairs for</p> <p>Page 103</p>	<p>1 HAN CHUNGUANG</p> <p>2 long. Then she asked me to stay on to help her</p> <p>3 out as an agent.</p> <p>4 Q Wasn't it Mr. Guo's wish for his</p> <p>5 daughter to purchase Eastern Profit from you?</p> <p>6 MR. CHUFF: Objection. Beyond</p> <p>7 the scope.</p> <p>8 A I don't know.</p> <p>9 Q Did you resign from Eastern Profit</p> <p>10 because you needed someone to buy the stock from</p> <p>11 you, you were short on money?</p> <p>12 MR. CHUFF: Objection. This is</p> <p>13 way beyond the scope that the court</p> <p>14 allowed this witness to appear, and</p> <p>15 the topic then, the court allowed</p> <p>16 them to testify to.</p> <p>17 MS. DONNELLI: I'm about to hand</p> <p>18 the witness a document that was</p> <p>19 produced by Eastern Profit. I think</p> <p>20 it is relevant. Why else would it</p> <p>21 have been produced?</p> <p>22 MR. CHUFF: Whether he needs the</p> <p>23 money is in a document? I doubt it.</p> <p>24 MS. DONNELLI: We're marking</p> <p>25 this as Exhibit 30.</p> <p>Page 105</p>

27 (Pages 102 to 105)

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November 11, 2019



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<p>1 HAN CHUNGUANG 2 (Defendant's Exhibit 30, Notice 3 of Change of Company Secretary and 4 Director (Appointment/Cessation) 5 Bates stamped EASTERN-000400 to 402 6 marked for Identification as of this 7 date.) 8 MS. DONNELLI: This is the first 9 exhibit we've used. 10 Q Mr. Han, if you turn to the third 11 page of the document. At the bottom of the 12 document do you see your name typewritten? 13 A Yes. 14 Q Is that the handwritten form of your 15 name above it? 16 A Yes. 17 Q Did you place your name on this 18 document? 19 A Yes. 20 Q Did you place your name on this 21 document on June 27, 2017? 22 A Yes. 23 Q The second page of the document, on 24 the box that is numbered 17, the second 17 at the 25 bottom --</p> <p>Page 106</p>	<p>1 HAN CHUNGUANG 2 take a break? 3 MR. CHUFF: If it's okay with 4 you, yes. 5 MS. DONNELLI: Let's take a 6 break at the witness' request for, 7 say, 10 minutes. 8 (At this time, a brief recess 9 was taken.) 10 CONTINUED EXAMINATION 11 BY MS. DONNELLI: 12 Q We're back on the record. 13 MR. CHUFF: We've gone another 14 hour and still haven't hit the topics 15 that the court Mr. Han to testify to. 16 We're reserving the right to seek 17 fees for this waste of time. 18 Q I'm going to hand you, Mr. Han, a 19 piece of paper. I have written three lines, and 20 I've asked for you to write your name, hand write 21 your name on those three lines. 22 I'm going to hand you a document that 23 we're going to mark. By the way, that is 24 Exhibit 31, this piece of paper. The three places 25 that the witness has written his name is 31.</p> <p>Page 108</p>
<p>1 HAN CHUNGUANG 2 A Yes. 3 Q -- who has signed there? 4 MR. CHUFF: Objection. 5 Foundation. 6 A Guo Mei's signature. 7 Q Did Guo Mei ask you to sign this 8 Exhibit 30? 9 MR. CHUFF: Objection. This is 10 treading into what the court has said 11 counsel may not ask about which is 12 the sale of Eastern Profit from 13 Mr. Han to Guo Mei. It's docket 14 entry 189, pages 3 and 4. It was on 15 the relevance grounds. 16 Q Mr. Han, is Exhibit 30 the official 17 record of your resignation as a director of 18 Eastern Profit? 19 THE INTERPRETER: The witness 20 wants the interpreter to retranslate 21 the question. Interpreter will do 22 so. 23 (Interpreter complying) 24 A Yes. 25 MS. DONNELLI: Do we want to</p> <p>Page 107</p>	<p>1 HAN CHUNGUANG 2 (Defendant's Exhibit 31, a 3 piece of yellow paper containing the 4 witness' name handwritten three times 5 marked for Identification as of this 6 date.) 7 MR. CHUFF: Will that be going 8 to the reporter? 9 MS. DONNELLI: Yes. The 10 reporter is going to keep the 11 exhibits. 12 We're going to mark as 13 Exhibit 32 a document. It already 14 has an exhibit label as Guo. 15 (Defendant's Exhibit 32, a 16 two-page document titled Limited 17 Power of Attorney Bates stamped 18 EASTERN-000276 and 277 marked for 19 Identification as of this date.) 20 Q What is the title of this document, 21 Mr. Han? 22 A Can you translate it for me. 23 MS. DONNELLI: Can you translate 24 the title of the document for him? 25 A I understand.</p> <p>Page 109</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Q All right. The second page, is that</p> <p>3 your handwritten name above the words Chunguang</p> <p>4 Han?</p> <p>5 A Yes.</p> <p>6 Q Did you place your handwritten</p> <p>7 signature there?</p> <p>8 A Yes.</p> <p>9 Q Was this on behalf of Eastern Profit?</p> <p>10 A Yes.</p> <p>11 Q What was the purpose of this</p> <p>12 document?</p> <p>13 A This was a Power of Attorney that I</p> <p>14 gave Yvette the authority to handle the</p> <p>15 investigation company's matter.</p> <p>16 Q When did you sign this?</p> <p>17 A Last year, 2018.</p> <p>18 Q Who asked you to sign this on behalf</p> <p>19 of Eastern Profit?</p> <p>20 A I don't understand your question.</p> <p>21 (The requested portion of the</p> <p>22 record was read back by the</p> <p>23 reporter.)</p> <p>24 MR. CHUFF: Objection. Assumes</p> <p>25 facts.</p> <p>Page 110</p>	<p>1 HAN CHUNGUANG</p> <p>2 MR. PODHASKIE: Objection.</p> <p>3 Asked and answered.</p> <p>4 THE INTERPRETER: Interpreter</p> <p>5 needs the witness to repeat one</p> <p>6 portion of answer.</p> <p>7 (Witness complying)</p> <p>8 A Guo Mei gave me authorization to</p> <p>9 agent, and then I gave the authorization to Yvette</p> <p>10 to handle the matters.</p> <p>11 Q Was Yvette an agent also?</p> <p>12 A Yes. After I gave her the</p> <p>13 authorization, she handled the matters, all the</p> <p>14 matters on my behalf.</p> <p>15 Q Were the authorizations done at the</p> <p>16 same time?</p> <p>17 MR. CHUFF: Objection. Asked</p> <p>18 and answered.</p> <p>19 A After June 27, 2017 when I</p> <p>20 transferred my company to Guo Mei, Guo Mei</p> <p>21 authorized me to be her agent. And then not long</p> <p>22 after that, I authorized Yvette to handle the</p> <p>23 matter for me.</p> <p>24 Q Was the authorization from Guo Mei to</p> <p>25 you put in writing?</p> <p>Page 112</p>
<p>1 HAN CHUNGUANG</p> <p>2 A Yvette told me at the time we were</p> <p>3 lied to, we were deceased, and we might have to</p> <p>4 file a lawsuit against the other parties.</p> <p>5 One day last year Yvette called me</p> <p>6 saying that she had this document for me to sign</p> <p>7 to authorize her to handle all these matters. I</p> <p>8 said okay. And then I went to Yvette's, yes,</p> <p>9 Yvette's office to sign this document.</p> <p>10 Q Where was Yvette's office located?</p> <p>11 MR. CHUFF: Objection. Asked</p> <p>12 and answered.</p> <p>13 A 800 Fifth Avenue.</p> <p>14 Q So you did not prepare this document</p> <p>15 yourself?</p> <p>16 A No, I did not.</p> <p>17 Q Why did Guo Mei not sign this</p> <p>18 document?</p> <p>19 A Because Guo Mei gave me the</p> <p>20 authorization to handle the matters, and I gave</p> <p>21 the authorization to Yvette to handle the matters.</p> <p>22 And Yvette would report to me.</p> <p>23 Q So we have two authorizations, one</p> <p>24 from Guo Mei to you and one from you to Yvette;</p> <p>25 correct?</p> <p>Page 111</p>	<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: Objection. Asked</p> <p>3 and answered.</p> <p>4 A No. Orally only.</p> <p>5 Q Was your authorization to Yvette put</p> <p>6 in writing?</p> <p>7 A Here.</p> <p>8 Q I'm sorry. It's Exhibit 32?</p> <p>9 A Yes.</p> <p>10 Q At the time that you signed</p> <p>11 Exhibit 32, you were no longer a director of</p> <p>12 Eastern Profit; correct?</p> <p>13 MR. CHUFF: Objection. Asked</p> <p>14 and answered.</p> <p>15 A That's correct.</p> <p>16 Q As a director of Eastern Profit, you</p> <p>17 never allowed it to enter into a transaction</p> <p>18 without signing a contract; correct?</p> <p>19 A I don't understand your question.</p> <p>20 Q When you were a director of Eastern</p> <p>21 Profit, did it enter into any transaction without</p> <p>22 signing a written document?</p> <p>23 MR. CHUFF: Objection. Form.</p> <p>24 A I don't understand your question.</p> <p>25 What do you mean by transaction without contract.</p> <p>Page 113</p>



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<p>1 HAN CHUNGUANG</p> <p>2 Q Mr. Han, you wouldn't enter into a</p> <p>3 transaction for Eastern Profit without a contract;</p> <p>4 true?</p> <p>5 A In general, yes.</p> <p>6 Q So why didn't you require Guo Mei to</p> <p>7 put her authorization to you in writing?</p> <p>8 MR. CHUFF: Objection.</p> <p>9 Misleading. Irrelevant.</p> <p>10 A No. It was not necessary. I had</p> <p>11 known her for a long time. I built enough trust</p> <p>12 to trust in her over this.</p> <p>13 Q When Yvette asked you to sign</p> <p>14 Exhibit 32, did you say: Wait a second. I can't</p> <p>15 sign this. I'm no longer a director of Eastern</p> <p>16 Profit?</p> <p>17 MR. CHUFF: Objection.</p> <p>18 Misleading. He's already testified a</p> <p>19 number of times that he's an agent.</p> <p>20 MS. DONNELLI: Please stop</p> <p>21 testifying for the witness.</p> <p>22 MR. CHUFF: Stop trying to</p> <p>23 confuse the witness.</p> <p>24 MS. DONNELLI: Please stop</p> <p>25 testifying for the witness.</p> <p>Page 114</p>	<p>1 HAN CHUNGUANG</p> <p>2 Misleading. Attempting to confuse</p> <p>3 the witness.</p> <p>4 A No. I signed the document because I</p> <p>5 was an agent for Eastern Profit.</p> <p>6 Q Explain to me why Guo Mei took your</p> <p>7 role as director of Eastern Profit. Why did she</p> <p>8 not coordinate directly with Yvette and leave you</p> <p>9 out of this document 32?</p> <p>10 A I don't know why she didn't do that.</p> <p>11 However, I was an agent of the company. And over</p> <p>12 this matter, Yvette and I initiated the project.</p> <p>13 When the project became problematic,</p> <p>14 of course I will continue to finish it off as an</p> <p>15 agent of the company.</p> <p>16 Q What is the difference, Mr. Han,</p> <p>17 between an agent and a director of Eastern Profit?</p> <p>18 MR. CHUFF: Objection. Calls</p> <p>19 for a legal conclusion.</p> <p>20 A The director is Guo Mei, and Guo Mei</p> <p>21 tells me it's her agent. I can handle matters for</p> <p>22 her on her behalf.</p> <p>23 Q But you weren't handling matters for</p> <p>24 her, you were delegating to Yvette; isn't that</p> <p>25 true?</p> <p>Page 116</p>
<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: He testified five</p> <p>3 times now that he's an agent.</p> <p>4 MS. DONNELLI: You're</p> <p>5 discontinuing it on.</p> <p>6 MR. CHUFF: I'm continuing it</p> <p>7 on?</p> <p>8 MS. DONNELLI: Yes.</p> <p>9 MR. CHUFF: Someone is.</p> <p>10 MS. DONNELLI: Testifying for</p> <p>11 the witness is unacceptable, and</p> <p>12 we'll bring that up later.</p> <p>13 MR. CHUFF: Merely repeating the</p> <p>14 answer that he's given times now.</p> <p>15 A My attorney say I didn't have to</p> <p>16 answer this question.</p> <p>17 Q Not true.</p> <p>18 MR. CHUFF: When she fixes the</p> <p>19 question, you can answer it.</p> <p>20 MS. DONNELLI: Will you please</p> <p>21 read the question back.</p> <p>22 (The requested portion of the</p> <p>23 record was read back by the</p> <p>24 reporter.)</p> <p>25 MR. CHUFF: Objection.</p> <p>Page 115</p>	<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: Objection.</p> <p>3 Mischaracterizes the testimony.</p> <p>4 Argumentative.</p> <p>5 A That's correct. I ask Yvette to help</p> <p>6 me because Yvette and I had the same goal, that we</p> <p>7 were against Chinese communist parties. And when</p> <p>8 Yvette told me there was this wonderful company</p> <p>9 who could expose the Chinese government's</p> <p>10 corruption, I felt this was a good opportunity,</p> <p>11 because my company was freezed and my family were</p> <p>12 persecuted.</p> <p>13 I also was angry over this. And I</p> <p>14 was interested in doing so. I asked Yvette to</p> <p>15 help me out over this matter.</p> <p>16 Q Isn't it true that Yvette had skills</p> <p>17 that you didn't have and would, therefore, be a</p> <p>18 benefit to Eastern Profit?</p> <p>19 MR. CHUFF: Objection to form.</p> <p>20 A What you have just said is not</p> <p>21 completely right. It happened that Yvette at that</p> <p>22 time had this wonderful source which was the</p> <p>23 investigation company. And when she brought it up</p> <p>24 to me, I thought this was a wonderful opportunity</p> <p>25 to do so. That was why I asked her for her help.</p> <p>Page 117</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Q The help that you asked her for was</p> <p>3 Exhibit 32; correct?</p> <p>4 A Yes. And it started from the moment</p> <p>5 she mentioned that she had found this</p> <p>6 investigation company. I authorized her to deal</p> <p>7 with the investigation company and all other</p> <p>8 related issues.</p> <p>9 (Defendant's Exhibit 33, a</p> <p>10 document titled Substitution of</p> <p>11 Counsel consisting of two pages</p> <p>12 marked for Identification as of this</p> <p>13 date.)</p> <p>14 Q I'm going to hand you what we marked</p> <p>15 as Exhibit 33. Is that your handwriting signature</p> <p>16 above the typewritten words of your name?</p> <p>17 A Can you tell me what this is?</p> <p>18 Q Answer the question first, and then</p> <p>19 I'm happy to.</p> <p>20 A Before you tell me what this document</p> <p>21 is, I cannot tell whether this is my signature.</p> <p>22 Q Are you, Mr. Han, saying you cannot</p> <p>23 recognize your signature, whether it appears on</p> <p>24 this document?</p> <p>25 MR. CHUFF: Objection.</p> <p>Page 118</p>	<p>1 HAN CHUNGUANG</p> <p>2 that your signature?</p> <p>3 MR. CHUFF: Objection. I would</p> <p>4 ask the translator to read the title</p> <p>5 of the document to the witness.</p> <p>6 MS. DONNELLI: I would ask the</p> <p>7 witness if this is the handwritten</p> <p>8 form of his signature on the last</p> <p>9 page of Exhibit 34.</p> <p>10 MR. CHUFF: You're not providing</p> <p>11 translated copies of the document. I</p> <p>12 would ask the translator to read the</p> <p>13 title.</p> <p>14 MS. DONNELLI: I'm instructing</p> <p>15 you not to. The witness can be asked</p> <p>16 questions after I'm done.</p> <p>17 At least for my question,</p> <p>18 Exhibit 34, is that the handwritten</p> <p>19 form of the witness' signature on the</p> <p>20 last page?</p> <p>21 MS. DONNELLI: Miss translator,</p> <p>22 please just listen to my instruction</p> <p>23 as the attorney taking the</p> <p>24 deposition.</p> <p>25 MR. CHUFF: You have to</p> <p>Page 120</p>
<p>1 HAN CHUNGUANG</p> <p>2 Argumentative. This was an English</p> <p>3 speaking witness. They would be able</p> <p>4 to read the document. You should</p> <p>5 tell them what they're looking at.</p> <p>6 MS. DONNELLI: He can answer the</p> <p>7 question.</p> <p>8 A It doesn't look like my signature.</p> <p>9 MR. CHUFF: Are you going to</p> <p>10 tell him what you were looking at?</p> <p>11 You said you would after he answered</p> <p>12 the question.</p> <p>13 MS. DONNELLI: We're moving on.</p> <p>14 MR. CHUFF: Okay.</p> <p>15 MS. DONNELLI: We're going to</p> <p>16 look at what we have marked as</p> <p>17 Exhibit 34.</p> <p>18 (Defendant's Exhibit 34, a</p> <p>19 document titled Research Agreement</p> <p>20 dated December 29, 2017 Bates stamped</p> <p>21 EASTERN-000005 to 000009 marked for</p> <p>22 Identification as of this date.)</p> <p>23 Q I would ask for you to turn to the</p> <p>24 last page of this document.</p> <p>25 On the bottom right-hand side, is</p> <p>Page 119</p>	<p>1 HAN CHUNGUANG</p> <p>2 translate the objection too. That's</p> <p>3 ridiculous.</p> <p>4 THE INTERPRETER: The</p> <p>5 interpreter has translated the</p> <p>6 question three times per instruction</p> <p>7 of the questioning witness.</p> <p>8 MS. DONNELLI: Can you read the</p> <p>9 most recent question that I've asked?</p> <p>10 THE INTERPRETER: The signature?</p> <p>11 MS. DONNELLI: We'll start it</p> <p>12 like this.</p> <p>13 Q The last page of Exhibit 34, is that</p> <p>14 the handwritten form of your name?</p> <p>15 MR. CHUFF: I instruct the</p> <p>16 witness to ask what document it is</p> <p>17 that he's looking at.</p> <p>18 MS. DONNELLI: You can instruct</p> <p>19 the witness, which is improper. The</p> <p>20 witness can answer the question, and</p> <p>21 you can ask your witness questions</p> <p>22 after I'm done.</p> <p>23 MR. CHUFF: You are being</p> <p>24 completely unfair to the witness. He</p> <p>25 cannot read what document.</p> <p>Page 121</p>

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Han Chunguang  
November 11, 2019

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<p>1 HAN CHUNGUANG 2 MS. DONNELLI: How do you know 3 what he can and can't do? That in 4 itself is an interesting question. 5 But the one that matters for now is 6 the last one I asked. 7 Can you repeat that to the 8 witness? 9 THE INTERPRETER: (Complying) 10 MR. CHUFF: I instruct the 11 witness not to answer it until 12 counsel tells him what he's looking 13 at. 14 MS. DONNELLI: The witness is 15 going to heed your instruction? 16 A Yes, I will listen to my attorney. 17 MS. DONNELLI: So that we have a 18 clear record, the witness on 19 instruction of his counsel is 20 refusing to answer the question 21 whether his signature appears in 22 handwritten form on the last page of 23 Exhibit 34. 24 MR. CHUFF: Because defendant's 25 counsel refuses to identify the</p> <p style="text-align: right;">Page 122</p>	<p>1 HAN CHUNGUANG 2 document? 3 MR. CHUFF: Objection. 4 Mischaracterizes the testimony. 5 A Since you show me an English 6 document, which I cannot read, and then you ask me 7 whether my signature is on it, I think it is 8 normal in nature for me to ask what this document 9 is before I answer your question. I have right to 10 know what this document, English document, is. 11 Q Is today the first day you've seen 12 Exhibit 34? 13 A Yes. 14 MS. DONNELLI: We may come back 15 to Exhibit 34 in a moment. For now I 16 will mark Exhibit 35. 17 (Defendant's Exhibit 35, a 18 document titled Loan Agreement Bates 19 stamped EASTERN-000278 to 280 marked 20 for Identification as of this date.) 21 Q If we turn to the last page of 22 Exhibit 35. 23 A Yes. I'm looking at it. 24 Q Thank you. Do you see two 25 handwritten signatures on the last page of</p> <p style="text-align: right;">Page 124</p>
<p>1 HAN CHUNGUANG 2 document for a non English-speaking 3 witness. 4 Q I'm going to hand you Exhibit 31, 5 Mr. Han. Do you need me to tell you what that 6 document is before you can recognize whether it's 7 the handwritten form of your signature? 8 A Can you ask the interpreter to tell 9 me what this document is. 10 Q Can you answer the question about 11 Exhibit 31, please? 12 A Yes. So what is your question 13 related to this document? 14 Q Do you need me to tell you what 15 Exhibit 31 is before you can tell me if that's the 16 handwritten form of your name? 17 A No, I don't. 18 MS. DONNELLI: I would like to 19 look back at Exhibit 34. So that I 20 have a clear understanding, is it the 21 witness' testimony that the witness 22 cannot identify whether it is the 23 handwritten form of his name on 24 Exhibit 34, last page, unless I tell 25 him what the title is of the</p> <p style="text-align: right;">Page 123</p>	<p>1 HAN CHUNGUANG 2 Exhibit 35? 3 A Yes. 4 Q Is one of them the handwritten form 5 of your name? 6 MR. CHUFF: Same objection. 7 A The one above is. 8 Q Is that signature to the right of the 9 typewritten form of your name? 10 A Yes. 11 Q Did you place your signature on this 12 Exhibit 35? 13 MR. CHUFF: Objection. How can 14 he answer the question without 15 knowing what it is? 16 Q Have you ever seen Exhibit 35 until 17 today? 18 MR. CHUFF: Same objection. 19 A Can I ask my interpreter what the 20 title of this document is? 21 Q No. Please answer the question 22 whether or not you have seen this two and a half 23 page document labeled Exhibit 35 before today. 24 MR. CHUFF: Same objection. 25 A Based upon my recollection, this was</p> <p style="text-align: right;">Page 125</p>

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<p>1 HAN CHUNGUANG</p> <p>2 the loan agreement between William and I.</p> <p>3 Q Did Mr. Han, you place your signature</p> <p>4 and handwriting on page 3 of this Exhibit 35.</p> <p>5 A Yes.</p> <p>6 Q When did you do that?</p> <p>7 A In 2018. No. I think at end of</p> <p>8 2017.</p> <p>9 Q Which is your answer?</p> <p>10 MR. CHUFF: Objection.</p> <p>11 A What?</p> <p>12 Q Which is your answer?</p> <p>13 MR. PODHASKIE: Only if you</p> <p>14 know. Don't speculate.</p> <p>15 A The end of 2017.</p> <p>16 Q You said that William G's signature</p> <p>17 is below yours?</p> <p>18 MR. CHUFF: Objection.</p> <p>19 Mischaracterizes the testimony.</p> <p>20 A I don't understand your question.</p> <p>21 Q Does the signature of William G.</p> <p>22 appear below your signature on Exhibit 35, page 3?</p> <p>23 A My signature is above his.</p> <p>24 Q When you placed your signature on</p> <p>25 Exhibit 35, was Mr. G's signature already there or</p> <p style="text-align: right;">Page 126</p>	<p>1 HAN CHUNGUANG</p> <p>2 A In business meetings in Hong Kong I</p> <p>3 met William, as a result of which we became good</p> <p>4 friends.</p> <p>5 Q Was the meeting in Hong Kong about</p> <p>6 Eastern Profit business?</p> <p>7 A No.</p> <p>8 Q Who does Mr. G work for?</p> <p>9 MR. CHUFF: Objection. The</p> <p>10 court already ruled that you cannot</p> <p>11 ask about ACA's financial</p> <p>12 information.</p> <p>13 MS. DONNELLI: Counsel, I think</p> <p>14 you just hinted something to the</p> <p>15 witness that was improper. So why</p> <p>16 don't you just object to form.</p> <p>17 MR. WHO:</p> <p>18 MR. PODHASKIE: This whole thing</p> <p>19 is improper.</p> <p>20 MR. CHUFF: No. I'm instructing</p> <p>21 him not to answer because it's beyond</p> <p>22 the scope of what the court ordered.</p> <p>23 MS. DONNELLI: Then that is</p> <p>24 probably better than instructing the</p> <p>25 witness how to answer.</p> <p style="text-align: right;">Page 128</p>
<p>1 HAN CHUNGUANG</p> <p>2 not?</p> <p>3 MR. CHUFF: I'm sorry. Go</p> <p>4 ahead.</p> <p>5 A Both of us were in a hotel lobby when</p> <p>6 I asked him for loan to pay for the investigation</p> <p>7 company. At the time I signed first, and then he</p> <p>8 signed.</p> <p>9 Q So you both signed it the same day;</p> <p>10 is that your testimony?</p> <p>11 A William and I signed on the same day.</p> <p>12 Q What was the name of the hotel?</p> <p>13 A Palace. That's right.</p> <p>14 Q Was it here in New York City?</p> <p>15 A Yes.</p> <p>16 Q Does William G. live in New York</p> <p>17 City?</p> <p>18 MR. CHUFF: Objection. Beyond</p> <p>19 the scope of the deposition.</p> <p>20 A I don't know. I had no idea where he</p> <p>21 lived.</p> <p>22 Q Was Exhibit 35 the first time you had</p> <p>23 met William G. in person?</p> <p>24 A No. I had met him before this.</p> <p>25 Q On what occasion?</p> <p style="text-align: right;">Page 127</p>	<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: I did not --</p> <p>3 MS. DONNELLI: An Object.</p> <p>4 MR. CHUFF: If you would have</p> <p>5 let me finish, I would have gotten</p> <p>6 there.</p> <p>7 MS. DONNELLI: I don't know what</p> <p>8 more information you might have</p> <p>9 revealed.</p> <p>10 Can you repeat the question.</p> <p>11 (The requested portion of the</p> <p>12 record was read back by the</p> <p>13 reporter.)</p> <p>14 A I don't want to answer this question</p> <p>15 because this has nothing to do with this case.</p> <p>16 Q When you signed this Exhibit 35, what</p> <p>17 gave you reason to believe that William G. had</p> <p>18 money to loan to Eastern Profit?</p> <p>19 A Because at the time I called him, I</p> <p>20 said I had a project that would need \$1 million.</p> <p>21 I asked him if he could lend me the money. He</p> <p>22 thought about it and he said okay, because at the</p> <p>23 time we were good friends.</p> <p>24 Q You testified that you asked Mr. G to</p> <p>25 lend you the money. Do you mean you, Mr. Han,</p> <p style="text-align: right;">Page 129</p>

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<p>1 HAN CHUNGUANG 2 personally or something else? 3 A On behalf of Eastern Profit. 4 Q We see from the first page of 5 Exhibit 35 that it's dated December 29, 2017. 6 Do you see that on the first line? 7 MR. CHUFF: Objection. 8 A Yes. 9 Q By December, 2017, you hadn't been a 10 director of Eastern Profit for several months; 11 correct? 12 A Yes, that's correct. 13 Q So why did you believe you were in a 14 position to ask to borrow money for Eastern Profit 15 at that time? 16 MR. CHUFF: Objection. Asked 17 and answered. 18 MS. DONNELLI: Counsel, we 19 haven't even gotten into this 20 document. How it could be asked and 21 answered, I believe it couldn't have 22 been. 23 MR. CHUFF: He testified to 24 his -- 25 MS. DONNELLI: Please stop</p> <p>Page 130</p>	<p>1 HAN CHUNGUANG 2 the payment was going to come from the company 3 itself since the asset was freezed. I instead 4 borrowed money from him. 5 Q I thought you testified that Natasha 6 stopped working for Eastern Profit in 2016, two 7 years after you became director. 8 MR. CHUFF: Objection. 9 Mischaracterizes the testimony. 10 A Who are you talking about? 11 Q The person who the witness, Mr. Han, 12 talked about. Mr. Han, I believe you testified 13 that Natasha worked for Eastern Profit for two 14 years. 15 Did I remember that correctly? 16 A I think you misunderstood my answer. 17 Previously when I say that she had worked for the 18 company for two years, I thought I was trying to 19 tell you she worked for a company during the two 20 years I was the director. 21 But after that, she still helped out 22 with the company's affairs. 23 Q Mr. Han, weren't you a director of 24 Eastern Profit for three years, not two? 25 A I don't remember exactly how long.</p> <p>Page 132</p>
<p>1 HAN CHUNGUANG 2 testifying for the witness. 3 MR. CHUFF: You're trying to 4 confuse the witness. He testified to 5 his authority earlier. That's all I 6 will say. 7 MS. DONNELLI: Oh, because 8 you've answered the question for him, 9 so you can just stop; is that it? 10 Please stop instructing this witness 11 how to answer. 12 MR. CHUFF: You need to stop 13 trying to confusion the witness. 14 MS. DONNELLI: Can you read the 15 question back, please. 16 (The requested portion of the 17 record was read back by the 18 reporter.) 19 A Yes. As I have previously testified 20 numerous times, Guo Mei authorized me as her agent 21 to handle matters on behalf of Eastern Profit. 22 Q How did you know that Eastern Profit 23 needed to borrow money as this Exhibit 35 shows? 24 A Because Natasha at the time told me 25 the company assets were frozen. And at the time</p> <p>Page 131</p>	<p>1 HAN CHUNGUANG 2 It was more than two years. 3 Q I thought you also testified, 4 Mr. Han, that Natasha was a person who was taken 5 by the Chinese communist party? 6 A Yes. 7 Q So how was Natasha able to inform you 8 in December of 2017 that Eastern Profit needed to 9 borrow money? 10 A I don't think she was taken away in 11 2017. I think she was taken by the police last 12 year in 2018. 13 Q How many times did you meet with 14 Mr. G in person about this loan agreement? 15 A I think two or three times. 16 Q Was that before or after the meeting 17 in the hotel lobby? 18 A I think before. 19 Q Mr. G brought this loan agreement 20 with him to meet you in the hotel lobby; correct? 21 A Before this, we talked about a loan 22 over the phone, and then William drafted the 23 document. At the end, he brought it to the hotel 24 lobby, to which both of us signed. 25 Q You were the one then who negotiated</p> <p>Page 133</p>

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<p>1 HAN CHUNGUANG 2 the terms of the loan on behalf of Eastern Profit; 3 correct? 4 MR. CHUFF: Objection. 5 Mischaracterizes the testimony. 6 A Yes. William and I talked over the 7 phone about the interest payment of 2 percent and 8 about a half year and stuff like that. 9 Q How about the amount of the loan, did 10 you negotiate that? 11 A A million dollars. 12 THE INTERPRETER: Interpreter 13 need to clear it with the witness. 14 A Yes, U.S.D. 15 Q When Mr. G handed you this document, 16 did you say to him wait, I can't sign this because 17 I'm no longer a director of Eastern Profit? 18 MR. CHUFF: Objection. 19 Misleading. 20 A No, I did not. 21 Q Did you keep a copy of this loan 22 agreement after you signed it that day in the 23 hotel lobby with Mr. G? 24 A No. 25 Q Why not?</p> <p>Page 134</p>	<p>1 HAN CHUNGUANG 2 would tell the fiscal department about this loan. 3 Q The fiscal department at Eastern 4 Profit or somewhere else? 5 A Of course Eastern Profit. 6 Q Did you explore what the terms would 7 be for Eastern Profit if it borrowed the money 8 from someone other than Mr. G? 9 A No. 10 Q Why not? 11 A There was no reason why. Besides, if 12 you look at these tons, they were acquired no more 13 in terms of Hong Kong needs market. As a matter 14 of fact, if you compare the terms to other loans, 15 they were quite reasonable. 16 Q But Mr. Han, did you compare the 17 terms of any other possible loan before signing 18 this document? 19 A No. 20 Q Is it your testimony that you and 21 Mr. G placed your respective signatures on this 22 document on December 29, 2017? 23 MR. CHUFF: Objection. Asked 24 and answered. 25 A Yes.</p> <p>Page 136</p>
<p>1 HAN CHUNGUANG 2 A There was no reason why. 3 Q Mr. Han, you signed this document on 4 behalf of Eastern Profit; correct? 5 A Yes. 6 Q Was any other representative of 7 Eastern Profit with you at the meeting in the 8 hotel lobby where you signed this loan agreement? 9 A No. 10 Q Did you have any certainty that 11 Eastern Profit, for which you've testified you 12 were an agent, was going to even get a copy of 13 this loan agreement if you didn't leave that 14 meeting with a copy of it? 15 MR. CHUFF: Objection to form. 16 A After the assets of Eastern Profit 17 was freezed, this was the only one loan I made was 18 such a huge amount. Of course I remembered. Once 19 the asset is un-freezed, I would tell the fiscal 20 about it. He had money, the one handle the money. 21 Q What does the term fiscal mean in 22 relation to Eastern Profit? 23 A What I mean is that the time I 24 borrowed this money on behalf of the company, of 25 course eventually the loan has to be paid. And I</p> <p>Page 135</p>	<p>1 HAN CHUNGUANG 2 Q When you met with Mr. G to sign this 3 loan agreement, did you have anything to eat or 4 drink with him? 5 A No. 6 MR. CHUFF: Counsel, whenever 7 you get to a natural spot, can we 8 take a 5 or 10-minute break. 9 MS. DONNELLI: Okay. 10 MR. CHUFF: It doesn't have to 11 be right now. Just whenever you get 12 there. 13 MS. DONNELLI: Thank you. 14 Q What is the status of this loan as we 15 sit here today? 16 A The money is still owed. 17 Q Has Eastern Profit made any payment 18 on this loan? 19 A No, because the asset continues being 20 freezed. 21 MS. DONNELLI: The witness' 22 counsel has asked for break. We'll 23 take a short 10-minute break. 24 (At this time, a brief recess 25 was taken.)</p> <p>Page 137</p>

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<p>1 HAN CHUNGUANG 2 CONTINUED EXAMINATION 3 BY MS. DONNELLI: 4 Q We are back after a short break. 5 Mr. Han, I would ask you to look at 6 Exhibit 34. This is a document entitled Research 7 Agreement. 8 Would you agree that this is the 9 research agreement for the investigative project 10 that you testified about today? 11 MR. CHUFF: Objection. 12 MR. PODHASKIE: Objection. 13 Foundation. 14 A I have never seen this document 15 before. 16 Q Could you turn to the last page of 17 the document. Is that the handwritten form of 18 your name on the last page at the bottom? 19 A Can the interpreter tell me again 20 what this is. 21 Q The name of the document, sure. 22 THE INTERPRETER: (Interpreter 23 complying) 24 A This is not my signature. 25 Q But does it reflect your name?</p> <p>Page 138</p>	<p>1 HAN CHUNGUANG 2 A Yes. 3 Q Then why don't you just work out the 4 Eastern Profit loan with Mr. G rather than having 5 Yvette do that job as you asked her to do in the 6 lobby of her building? 7 MR. CHUFF: Objection. 8 Mischaracterizes testimony. 9 A I don't understand your question. 10 Which lobby of the building, and what did I tell 11 Yvette? 12 Q Has Mr. G attempted to collect the 13 loan back from Eastern Profit? 14 A Yes. 15 Q How has he done that? 16 A He called and he said so in 17 face-to-face meeting. 18 Q Was Yvette at that meeting? 19 A No. 20 Q What did Mr. G say to you? 21 A William called me over the phone and 22 said that it was time to pay back the loan, 23 including accrued interest. 24 Q What did you do with that 25 information?</p> <p>Page 140</p>
<p>1 HAN CHUNGUANG 2 A Where? 3 Q On the last page of the document. 4 MR. CHUFF: Can I direct him? 5 A Can you point it out to me? 6 Q I don't need to point it out. If the 7 witness does not recognize the handwritten form of 8 his name, then that's the answer that I'll take. 9 A This was not my signature. This is 10 not my signature. I did not see my name. I don't 11 see my name on it. 12 Q Now Mr. Han, you testified that you 13 were good friends with William G. Did I recall 14 that correctly? 15 A Yes. 16 Q You have had positive interactions 17 with Mr. G over the years? 18 A Yes. 19 Q You met Mr. G in Hong Kong on 20 business at least one time. 21 A I would say more like business 22 activities or events. 23 Q But you've been able to have a good 24 interaction with Mr. G in those events; true? 25 MR. CHUFF: Objection. Form.</p> <p>Page 139</p>	<p>1 HAN CHUNGUANG 2 A When he told me that, I say to him we 3 got into some trouble. We encountered some liars. 4 People were trying to scam us. I definitely tell 5 him that we needed more time to pay back the loan. 6 Q Was Eastern Profit a client of ACA? 7 A I don't think you can say that. 8 Q Meaning that it's not true? 9 MR. CHUFF: Objection. Beyond 10 the scope. 11 A Let me put it this way. What you 12 have just said can be true. The fact is that I 13 borrowed the money from William. As far as what 14 company William took the money out to lend me, it 15 was his business. 16 Q Does William -- 17 A He could be getting the money from 18 ACA or somewhere else, that I had no control over, 19 but the fact was that I borrowed the money from 20 William. 21 Q So in your mind, Eastern Profit was 22 borrowing \$1 million from William G? 23 MR. CHUFF: Objection. Form. 24 A I borrowed money from him. Of course 25 he issued the money to me from one of his</p> <p>Page 141</p>

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<p>1 HAN CHUNGUANG</p> <p>2 Yvette told you that you needed to get money and</p> <p>3 when you actually got the money from William G?</p> <p>4 A Several days.</p> <p>5 Q Was it less than a month?</p> <p>6 MR. CHUFF: Objection. Asked</p> <p>7 and answered.</p> <p>8 A Again, I don't remember, but I think</p> <p>9 it was a month, several days later.</p> <p>10 Q What collateral did Eastern Profit</p> <p>11 give for the loan?</p> <p>12 MR. PODHASKIE: Objection.</p> <p>13 MR. CHUFF: Objection. Assumes</p> <p>14 facts.</p> <p>15 A When you say collateral, what do you</p> <p>16 mean?</p> <p>17 Q Security for the repayment of the</p> <p>18 loan.</p> <p>19 A Number 1, the guarantee was that when</p> <p>20 the assets company was un-frozen as a result of</p> <p>21 the investigation, I will return him the money and</p> <p>22 pay him back the loan.</p> <p>23 Secondly, we were good friends. We</p> <p>24 had enough trust.</p> <p>25 Q If you had enough trust, why isn't</p> <p>Page 146</p>	<p>1 HAN CHUNGUANG</p> <p>2 A No.</p> <p>3 Q Do you know who Lianchao Han is?</p> <p>4 L-I-A-N-C-H-A-O H-A-N.</p> <p>5 A Can you just repeat it again.</p> <p>6 Q Lianchao Han.</p> <p>7 A The way you read it, I don't think</p> <p>8 so. You're not telling me. I don't know this</p> <p>9 person the way you read it. The way you spell it,</p> <p>10 L-I-A-N-C-H-A-O. Lianchao, I don't know this</p> <p>11 person.</p> <p>12 Q Do you know someone with a name</p> <p>13 similar to that?</p> <p>14 MR. CHUFF: Objection to form.</p> <p>15 A Again, I don't have any impression of</p> <p>16 this name.</p> <p>17 Q This morning I introduced you to</p> <p>18 French Wallop who is sitting to my left.</p> <p>19 A Mm-hmm.</p> <p>20 Q Have you ever seen Miss Wallop before</p> <p>21 today?</p> <p>22 A No. I don't have a memory of it.</p> <p>23 Q Did you ever prepare a meal for</p> <p>24 Miss Wallop and in Mr. Guo's apartment?</p> <p>25 MR. PODHASKIE: Objection. I</p> <p>Page 148</p>
<p>1 HAN CHUNGUANG</p> <p>2 Yvette dealing with William G now instead of you?</p> <p>3 MR. CHUFF: Objection. Form.</p> <p>4 A There was no why. I give Yvette the</p> <p>5 full authority to take care of this matter, and</p> <p>6 she took care of this matter for me. That was it.</p> <p>7 Q Do you know the individual name Je</p> <p>8 Kin Ming? J-E K-I-N M-I-N-G.</p> <p>9 A No.</p> <p>10 Q Do you ever exchange E-mails with</p> <p>11 William G?</p> <p>12 A No.</p> <p>13 Q You've never received an E-mail from</p> <p>14 William G?</p> <p>15 A No.</p> <p>16 Q Have you ever met Karen Maistrello?</p> <p>17 MR. CHUFF: Objection to form.</p> <p>18 A I don't have impression of her.</p> <p>19 Q You've never met Karen Maistrello?</p> <p>20 MR. CHUFF: Objection.</p> <p>21 Mischaracterizes the testimony.</p> <p>22 A When you just bring this name up, I</p> <p>23 don't have any impression of it.</p> <p>24 Q What about if the first name is</p> <p>25 Karen?</p> <p>Page 147</p>	<p>1 HAN CHUNGUANG</p> <p>2 don't understand scope.</p> <p>3 A Why would I prepare a meal for her,</p> <p>4 especially I am not even a chef.</p> <p>5 Q So it's a yes or no question. Please</p> <p>6 answer it.</p> <p>7 A No.</p> <p>8 MR. CHUFF: Objection.</p> <p>9 Q I introduced you this morning to</p> <p>10 Mr. Michael Waller, who is sitting to the left of</p> <p>11 me.</p> <p>12 Mr. Waller, have you ever seen</p> <p>13 Mr. Waller before today?</p> <p>14 A Again, I don't have any impression of</p> <p>15 him.</p> <p>16 Q Were you present when the terms of</p> <p>17 the investigation contract between Eastern Profit</p> <p>18 and the investigation company were negotiated?</p> <p>19 MR. PODHASKIE: Objection.</p> <p>20 Asked and answered.</p> <p>21 A No.</p> <p>22 Q Did you have any role in the</p> <p>23 negotiation of the contract between Eastern Profit</p> <p>24 and the investigative company?</p> <p>25 MR. CHUFF: Same objection.</p> <p>Page 149</p>

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November 11, 2019

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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: center;">A C K N O W L E D G M E N T</p> <p>STATE OF NEW YORK    )</p> <p style="padding-left: 100px;">ss:</p> <p>COUNTY OF _____ )</p> <p>I, Han Chunguang, hereby certify that I have read the transcript of my testimony taken under oath in my deposition of November 11, 2019; that the transcript is a true and complete record of my testimony, and that the answers on the record as given by me are true and correct.</p> <p style="text-align: center;">_____ HAN CHUNGUANG</p> <p>Subscribed and sworn to before me This        day of        2019</p> <p style="text-align: center;">_____ (NOTARY PUBLIC)</p> <p style="text-align: right;">Page 158</p>	
<p>2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: center;">C E R T I F I C A T E</p> <p>I, Terri Fudens, a stenotype reporter and Notary Public within and for the State of New York, do hereby certify:</p> <p>That the witness whose testimony is hereinbefore set forth was duly sworn by me and that such testimony is a true record of the testimony given by such witness.</p> <p>I further certify that I am not related to any of the parties by blood or marriage, and that I am in no way interested in the outcome of this matter.</p> <p>IN WITNESS WHEREOF, I have hereunto set my hand.</p> <p>Signature Requested</p> <p style="text-align: center;">_____ Terri Fudens</p> <p style="text-align: right;">Page 159</p>	

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